

## Appendix 8

### Cultural Resources

Appendix 8 includes the following correspondences related to agency consultation and tribal communications for the West of Devers Upgrade Project.

#### **Agency Consultation:**

- BLM letter to SHPO initiating Section 106 Consultation
- SHPO response letter to BLM, dated July 28, 2014
- BLM letter to ACHP, dated August 22, 2014
- ACHP response letter to BLM, dated September 5, 2014
- BLM letter to SHPO requesting concurrence with the Project's eligibility determinations and effects, dated May 10, 2016
- SHPO concurrence letter to BLM concurring, dated May 17, 2016

#### **Tribal Communication:**

- SCE Tribal contact letters, dated June 27, 2013
- BLM letter to Tribes, dated May 20, 2014
- BLM follow-up letters to Tribes, dated August 22, 2014



**United States Department of the Interior  
BUREAU OF LAND MANAGEMENT**

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**MAY 20 2014**

**In Reply Refer To:**  
CAD060/CAD000.06  
2831-03/2850(P)  
CACA - 0063162

**CERTIFIED MAIL 7012 3460 0000 2912 1666  
RETURN RECEIPT REQUESTED**

Carol Roland-Nawi, Ph.D.  
State Historic Preservation Officer  
Office of Historic Preservation  
1725 23rd Street, Suite 100  
Sacramento, CA 95816

ATTN: Brendon Greenaway, Associate State Archaeologist

RE: West of Devers Transmission Line Upgrade Project, Riverside and San Bernardino Counties,  
California

Dear Dr. Roland-Nawi:

The Bureau of Land Management (BLM) is reviewing an application for a right-of-way (ROW) grant and proposed Plan of Development (POD) submitted by Southern California Edison (SCE) to upgrade, operate, and maintain approximately 1.1 miles of two 220 kV transmission lines on BLM administered lands, and remove some existing lines. The project is part of SCE's proposed upgrades to Segment 6 of the larger six segment West of Devers (WOD) Upgrade Project. Through WOD SCE proposes to upgrade 45 miles of two 220kV transmission lines between Palm Springs and San Bernardino, California (see Enclosure 1). The proposed project includes replacement of two existing single-circuit and one existing double-circuit 220 kV transmission lines and towers with two double-circuit 220 kV transmission lines and higher capacity equipment, relocation of two miles of 66 kV sub transmission lines and four miles of 12 kV distribution lines, upgrades to six existing substations, and installation of telecommunications equipment. The proposed Project crosses lands managed by the BLM, lands in private ownership, and the Morongo Band of Mission Indians Tribal Reservation. Most of the proposed Project is located within an existing SCE ROW corridor. The California Public Utilities Commission (CPUC) is the lead agency for the State and California Environmental Quality Act (CEQA) compliance.

The BLM is close to initiating the National Environmental Policy Act (NEPA) stages of this proposed Project. The purpose of this letter is to 1) notify the State Historic Preservation Officer (SHPO) about the proposed Project, 2) to initiate formal consultation on this undertaking with your office and follow the procedures at 36 CFR § 800, and 3) to submit the agency's Area of Potential Effect (APE) determination for consultation pursuant to 36 C.F.R. § 800.4(a)(1). The BLM further requests to expedite the consultation process for the proposed Project, pursuant to 36 CFR § 800.3(g), by combining our consultation on the identification efforts with our consultation on the determinations of eligibility and findings of effect. The BLM is in the process of identifying consulting parties and determining the scope

of identification efforts for the Project. We would like to summarize activities which have been carried out to date for the purposes of analyzing the proposed undertaking.

The BLM has defined the APE for the agency's undertaking. The APE for direct effects includes the proposed and existing ROW corridor. The current ROW for the three existing 220kV transmission lines varies from 100 to 800 feet wide. The direct effects APE for the proposed 220kV transmission line corridor(s) includes the width of the existing ROW and any newly proposed ROW; a 50-foot-wide buffer on each side of the centerline of any existing road, 66kV sub transmission line, and distribution line that will be modified or newly developed for use by this proposed Project that otherwise extends beyond the 220kV transmission line corridor ROW; the land disturbance footprint for any staging area, materials yard, helicopter assembly yard; and the entire area of any substations modified for the proposed Project. The APE for indirect effects will be no more than ½-mile-wide on each side of the direct effects APE. Indirect effects to location, setting, feeling, and association of properties eligible for or listed on the National Register of Historic Places (NRHP) under Criterion A, B, or C, and unevaluated or unrecorded resources identified by Indian tribes will be considered. The BLM would like to consult with your office regarding this determination pursuant to 36 CFR § 800.4(a)(1).

#### **Status of Environmental Review**

SCE has developed a Proponents Environmental Assessment (PEA) as part of the CPUC CEQA review requirements. SCE conducted a number of studies to support their PEA including a literature review and records search ½ mile beyond the direct effects APE, and a Class III archaeological and built-environment inventory of the direct effects APE. The information gathered during the development of the PEA was incorporated into the POD that was submitted to the BLM.

An Environmental Impact Statement/Environmental Impact Report (EIS/EIR) will be prepared to evaluate the impacts of the proposed WOD Project. The CPUC is the State lead agency for the preparation of the EIR in compliance with the requirements of CEQA (Public Resources Code Section 21000 et. seq.), CEQA implementing guidelines (California Code of Regulations [CCR] Title 14, Section 15000 et. seq.). The BLM is the Federal lead agency for the preparation of the EIS in compliance with the requirements of NEPA, the Council on Environmental Quality (CEQ) regulation for implementing NEPA (40 Code of Federal Regulations [CFR] 1500 – 1508), and the BLM NEPA guidance handbook (H-1790-1). A joint EIS/EIR will be prepared to evaluate the proposed Project. The proposed Project will concurrently be analyzed for its potential to affect historic properties as required by section 106 of the National Historic Preservation Act (NHPA), and we will utilize the public review process described in the NEPA to partially meet our public involvement responsibilities under the NHPA. In addition, section 106 documentation for this proposed Project will be published on our website at <http://www.blm.gov/ca/st/en/fo/cdd.html>.

#### **Status of Cultural Resources Studies**

SCE has contracted with LSA to identify and evaluate all historic and archaeological resources within the APE. The CPUC has contracted with Aspen Environmental Group, and their subcontractors Applied Earthworks, to analyze the results of all cultural resources studies for presentation in the EIR/EIS. To date, LSA has conducted a literature review, records search, and BLM Class III archaeological and built environment survey of the direct effects APE. The BLM is currently reviewing the draft Class III report prepared by LSA to support SCE's PEA.

The literature review and records search conducted for the proposed Project included the APE plus a one-half-mile buffer. Record searches at the San Bernardino Archaeological Information Center, the Eastern Information Center, and the BLM have provided information about known resources on national, state, and local registries, as well as other previously recorded archaeological sites along the proposed Project corridor. Historic maps and General Land Office records at the Orbach Science Library Map Collection at

the University of California, Riverside, and Riverside County Assessor's Office on-line records were also consulted. The records search indicated that 232 archaeological resource inventories have been conducted and 423 cultural resources have been recorded within ½ mile of the proposed Project area. Of the cultural resources documented in the records search and literature review, 70 resources were identified within the direct effects APE. These resources include 31 historic resources, 30 historic architectural resources, 7 prehistoric resources, 1 historic Native American Rancheria, and 1 historic Native American village site and cemetery. Two of these resources are California Historic Landmarks (#95 and #749), two are Registered State Historic Points of Interest (No. RIV-048 and RIV-049), and five have been previously recommended eligible for listing in the NRHP.

LSA conducted a Class III archaeological and built environment survey of the direct effects APE. Those surveys have resulted in the identification of 193 new cultural resources, including 190 historic resources, 3 prehistoric archaeological sites, and 50 isolated artifacts. Additional archival research is being done to support NRHP eligibility evaluations. The draft report is currently under review by the BLM. LSA is currently developing an evaluation plan for one archaeological site (CA-SBR-2311H/Guachama Rancheria) that is identified in the draft Class III report as requiring archaeological testing to evaluate.

LSA is also developing a contingency evaluation plan for the evaluation of any additional resources that may be impacted based on a planned final engineering design that is scheduled to be completed by June 2014. This plan will further refine the current POD to account for information gathered during the PEA studies and provide final locations for all proposed structures, equipment, and work areas. Once the final design has been released the BLM and CPUC will reassess the cultural resources studies and determine if any additional evaluation needs must be addressed. Any additional evaluation that may become necessary as a result of the final design completion will be conducted according to the contingency developed in the evaluation plan.

The BLM has also requested that SCE conduct an ethnographic literature review and indirect effects analysis for the proposed Project. Since the proposed Project is an upgrade to existing transmission lines and is located almost entirely within an existing ROW corridor, the BLM has defined the indirect effects APE as ½-mile beyond the direct effects APE. SCE's contractor will be analyzing indirect effects from the proposed project to the location, setting, feeling, and association of known NRHP eligible or listed properties within the indirect effects APE. This study will include known historic, archaeological, and tribal resources.

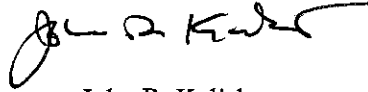
#### **Status of Tribal Consultation**

The BLM is concurrently notifying Indian tribes about this undertaking and requesting government-to-government consultation by letter. Fourteen federally recognized Indian tribes have been identified and are being invited to consult on the proposed Project, including the Agua Caliente Band of Cahuilla Indians, Augustine Band of Cahuilla Indians, Cabazon Band of Mission Indians, Cahuilla Band of Mission Indians, Morongo Band of Mission Indians, Pala Band of Mission Indians, Pauma/Yuima Band of Mission Indians, Pechanga Band of Mission Indians, Ramona Band of Mission Indians, Rincon Luiseno Band of Indians, San Manuel Band of Mission Indians, Soboba Band of Luiseno Indians, Torres-Martinez Desert Cahuilla Indians, and Twenty-nine Palms Band of Mission Indians.

As noted at the outset, the purpose of this letter is to notify your office of the proposed West of Devers Transmission Line Upgrade Project, initiate formal consultation on this undertaking with your office in accordance with the 36 CFR § 800 Regulations, to submit the agency's APE determination for consultation pursuant to 36 C.F.R. § 800.4(a)(1), and request to expedite the remainder of the consultation process for the proposed Project pursuant to 36 CFR § 800.3(g) by combining our consultation on the identification efforts with our consultation on the determinations of eligibility and findings of effect.

We appreciate your attention to our request and look forward to consulting on the proposed undertaking. If we can provide any information or address any questions regarding this undertaking, please do not hesitate to contact Tiffany Thomas, BLM Renewable Energy Archaeologist, at (951) 697-5365, or by e-mail at [tathomas@blm.gov](mailto:tathomas@blm.gov). You may also contact me at (760) 326-7000 or by e-mail at [jkalish@blm.gov](mailto:jkalish@blm.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'John R. Kalish', with a stylized flourish at the end.

John R. Kalish  
Field Manager

Electronic CC:

Greg Miller ([gmiller@blm.gov](mailto:gmillier@blm.gov))

Brian Paul ([rpaul@blm.gov](mailto:rpaul@blm.gov))

Tiffany Thomas ([tathomas@blm.gov](mailto:tathomas@blm.gov))

George Kline ([gkline@blm.gov](mailto:gkline@blm.gov))

Charlotte Hunter ([cahunter@blm.gov](mailto:cahunter@blm.gov))

Tony Overly ([soverly@blm.gov](mailto:soverly@blm.gov))

Enclosures:

1 - Project Area Map

**OFFICE OF HISTORIC PRESERVATION  
DEPARTMENT OF PARKS AND RECREATION**

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July 28, 2014

In Reply Refer To: BLM\_2014\_0523\_001

John R. Kalish, Field Manager  
United States Department of the Interior  
Bureau of Land Management  
Palm Springs-South Coast Field Office  
1201 Bird Center Drive  
Palm Springs, CA 92262-8001

Re: Initiating Section 106 Consultation for the West of Devers Transmission Line Upgrade Project

Dear Mr. Kalish:

Pursuant to 36 CFR Part 800 (as amended 8-05-04) regulations implementing Section 106 of the National Historic Preservation Act, the Bureau of Land Management (BLM), is initiating formal consultation, seeking my comments on its determination of the Area of Potential Effects (APE) and its planned historic property identification efforts for the West of Devers Transmission Line Upgrade Project. The BLM is also requesting to expedite the remainder of the consultation process pursuant to 36 CFR Part 800.3(g).

The BLM is reviewing an application for a right-of-way (ROW) grant and proposed Plan of Development (POD) submitted by Southern California Edison (SCE) to remove existing transmission lines and upgrade, operate, and maintain approximately 1.1 miles of two 220 kV transmission lines on BLM administered lands. The project is part of SCE's proposed upgrades to Segment 6 of the larger six segment West of Devers (WOD) Upgrade Project. The proposed project includes replacement of two existing single-circuit and one existing double-circuit 220 kV transmission lines and towers with two double-circuit 220 kV transmission lines and higher capacity equipment, relocation of two miles of 66 kV sub transmission lines and four miles of 12 kV distribution lines, upgrades to six existing substations, and installation of telecommunications equipment. The proposed Project crosses lands managed by the BLM, lands in private ownership, and the Morongo Band of Mission Indians Tribal Reservation. Most of the proposed Project is located within an existing SCE right-of- way (ROW) corridor.

The APE for direct effects includes the entire length of the proposed and existing ROW corridor (45 miles). The current ROW for the three existing 220kV transmission lines varies from 100 to 800 feet in width. The direct effects APE for the proposed 220kV transmission line corridor(s) includes the width of the existing ROW and any newly proposed ROW; a 50-foot-wide buffer on each side of the centerline of any existing road, 66kV sub transmission line, and distribution line that will be modified or newly developed for use by this proposed Project that otherwise extends beyond the 220kV transmission line corridor ROW; the land disturbance footprint for any staging area, materials yard, helicopter assembly yard; and the entire area of any substations modified for the proposed Project. The APE for indirect effects will be no more than ½-mile-wide on each side of the direct effects APE. Indirect effects to location, setting, feeling, and association of properties eligible for or listed on the National Register of Historic Places (NRHP) under

BLM\_2014\_0523\_001

Criterion A, B, or C, and unevaluated or unrecorded resources identified by Indian tribes will be considered.

SCE has conducted a number of studies including a literature review and records search ½ mile beyond the direct effects APE in which 423 cultural resources were identified. A Class III archaeological and built-environment inventory of the direct effects APE was conducted by LSA on behalf of SCE; 193 new cultural resources were identified. The draft report is currently under review by BLM and archival research is being done to support NRHP eligibility determinations. An ethnographic literature review and indirect effects analysis has been requested by BLM. Fourteen federally recognized Indian Tribes have been identified and invited by letter to participate in government-to-government consultation.

Having reviewed your letter and supporting documentation, I have the following comments:

- 1) I agree that the BLM's delineation of the project's Area of Potential Effects is consistent with 36 CFR 800.16(d).
- 2) Pursuant to 36 CFR 800.3(g) I agree that expediting consultation is appropriate as long as consulting parties and the public have an adequate opportunity to express their views as provided in 36 CFR Part 800.2(d).
- 3) Pursuant to 36 CFR 800.4(a) and (b), I concur that the work plan constitutes a reasonable and good faith effort to identify historic properties within the APE.

Thank you for seeking my comments and for considering historic properties in planning your project. I look forward to continuing consultation on this project. If you require further information, please contact Brendon Greenaway of my staff at phone 916-445-7036 or email [brendon.greenaway@parks.ca.gov](mailto:brendon.greenaway@parks.ca.gov).

Sincerely,



Carol Roland-Nawi, PhD  
State Historic Preservation Officer



**United States Department of the Interior  
BUREAU OF LAND MANAGEMENT**

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***In Reply Refer To:***  
CACA-063162  
2831-03 (P)  
CAD000.06/CAD060

**AUG 22 2014**

Mr. Reid Nelson, Director  
Office of Federal Agency Programs  
Advisory Council on Historic Preservation  
Attention: Nancy Brown  
Liaison to the Bureau of Land Management  
1100 Pennsylvania Avenue NW, Room 803  
Washington DC 20004-2501

**RE: West of Devers Transmission Line Upgrade Project, Riverside and San Bernardino  
Counties, California**

Dear Mr. Nelson:

The Bureau of Land Management (BLM) is reviewing an application for a right-of-way (ROW) grant and proposed Plan of Development (POD) submitted by Southern California Edison (SCE) to upgrade, operate, and maintain two 220-kV transmission lines on approximately 1.1 miles of BLM-administered lands, and remove some existing lines. The project is part of SCE's proposed upgrades to Segment 6 of the larger six-segment West of Devers (WOD) Upgrade Project. For the entire project, SCE proposes to upgrade 45 miles of two 220-kV transmission lines between Palm Springs and San Bernardino, in Riverside and San Bernardino Counties, California (see Enclosure 1). The proposed project includes replacement of two existing single-circuit and one existing double-circuit 220-kV transmission lines and towers, with two double-circuit 220-kV transmission lines and higher capacity equipment; relocation of two miles of 66-kV sub transmission lines and four miles of 12-kV distribution lines; upgrades to six existing substations; and installation of telecommunications equipment. The proposed Project crosses lands managed by the BLM, lands in private ownership, and the Morongo Band of Mission Indians Tribal Reservation. Most of the proposed Project is located within an existing SCE ROW corridor. The California Public Utilities Commission (CPUC) is the lead agency for the State and California Environmental Quality Act (CEQA) compliance.

Pursuant to guidance from the BLM Washington Office and the Advisory Council on Historic Preservation (ACHP) and Information Bulletin 2013-020, the Secretary of the Interior's priority renewable energy projects and other major infrastructure projects have the potential to be controversial and complex undertakings and should be processed according the 36 CFR § 800 Regulations. The BLM would like to invite the participation of the ACHP in the Section 106 compliance process for this undertaking in accordance with 36 CFR 800.2(b)(1).



The undertaking and the area of potential effect (APE) for Section 106 has been defined, and the BLM is currently consulting with the California State Historic Preservation Office (SHPO) on the APE (May 7, 2014). The current ROW for the three existing 220-kV transmission lines varies from 100 to 800 feet wide. The direct effects APE for the proposed 220-kV transmission line corridor(s) includes the width of the existing ROW and any newly proposed ROW; a 50-foot-wide buffer on each side of the centerline of any existing road, 66-kV sub transmission line, and distribution line that will be modified or newly developed for use by this proposed Project that otherwise extends beyond the 220-kV transmission line corridor ROW; the land disturbance footprint for any staging area, materials yard, helicopter assembly yard; and the entire area of any substations modified for the proposed Project. The APE for indirect effects will be no more than one-half-mile wide on each side of the direct effects APE. Indirect effects to location, setting, feeling, and association of properties eligible for or listed on the National Register of Historic Places (NRHP) under Criterion A, B, or C, and unevaluated or unrecorded resources identified by Indian tribes will be considered.

#### ***Status of Environmental Review***

SCE has developed a Proponents Environmental Assessment (PEA) as part of the CPUC CEQA review requirements. SCE conducted a number of studies to support their PEA including a literature review and records search ½ mile beyond the direct effects APE, and a Class III archaeological and built-environment inventory of the direct effects APE. The information gathered during the development of the PEA was incorporated into the POD that was submitted to the BLM.

Under Federal law, the BLM is responsible for processing ROW applications for facilities proposed to be constructed and operated on public lands. An Environmental Impact Statement/Environmental Impact Report (EIS/EIR) will be prepared to evaluate the impacts of the proposed WOD Project. The CPUC is the State lead agency for the preparation of the EIR in compliance with the requirements of CEQA (Public Resources Code Section 21000 et. seq.), CEQA implementing guidelines (California Code of Regulations [CCR] Title 14, Section 15000 et. seq.). The BLM is the Federal lead agency for the preparation of the EIS in compliance with the requirements of NEPA, the Council on Environmental Quality (CEQ) regulation for implementing NEPA (40 Code of Federal Regulations [CFR] 1500 – 1508), and the BLM NEPA guidance handbook (H-1790-1). A joint EIS/EIR will be prepared to evaluate the proposed Project. The proposed Project will be analyzed concurrently for its potential to affect historic properties as required by section 106 of the National Historic Preservation Act (NHPA), and we will utilize the public review process described in the NEPA to partially meet our public involvement responsibilities under the NHPA. In addition, section 106 documentation for this proposed Project will be published on our website at <http://www.blm.gov/ca/st/en/fo/cdd.html>.

#### ***Status of Cultural Resources Studies***

SCE has contracted with LSA and ASM Affiliates to identify and evaluate all historic and archaeological resources within the APE. The CPUC has contracted with Aspen Environmental Group, and their subcontractors Applied Earthworks, to analyze the results of all cultural resources studies for presentation in the EIR/EIS. To date, LSA has conducted a literature review, records search, and BLM Class III archaeological and built environment survey of the direct effects APE to support SCE's PEA. The results of these studies are documented in the

final report entitled *Cultural Resources Assessment and Class III Inventory, West of Devers Project, Riverside and San Bernardino Counties, California* (enclosure 2).

Literature reviews and records searches for the direct effects APE plus a one-half-mile buffer were conducted at the San Bernardino Archaeological Information Center, the Eastern Information Center, and the BLM. Information was gathered regarding known resources on national, state, and local registries, as well as other previously recorded archaeological sites along the proposed Project corridor. Historic maps and General Land Office records at the Orbach Science Library Map Collection at the University of California, Riverside, and Riverside County Assessor's Office on-line records were also consulted. The records search indicated that 232 archaeological resource inventories have been conducted and 423 cultural resources have been recorded within one-half mile of the proposed Project area. Of the cultural resources documented in the records search and literature review, 70 resources were identified within the direct effects APE. These resources include 31 historic resources, 30 historic architectural resources, 7 prehistoric resources, 1 historic Native American Rancheria, and 1 historic Native American village site and cemetery. Two of these resources are California Historic Landmarks (#95 and #749), two are Registered State Historic Points of Interest (No. RIV-048 and RIV-049), and five have been previously recommended eligible for listing in the NRHP. The archaeological and built environment surveys resulted in the identification of 193 new cultural resources, including 190 historic resources, 3 prehistoric archaeological sites, and 50 isolated artifacts.

Based on the results of the Class III surveys, the BLM and CPUC have determined that additional information is required to evaluate seven archaeological resources for their eligibility for listing in the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR). Six archaeological sites (CA-RIV-11411, CA-RIV-11417, CA-RIV-11419, CA-RIV-11426, CA-SBR-11624H, and P-36-24295) require additional archival research in order to be evaluated under Criteria A/1 and B/2 for their association with significant events or persons in history. One archaeological site (CA-SBR-2311H) will require archaeological testing in order to be evaluated under Criterion D/4 for its information potential. A testing plan has been developed to guide the additional research efforts (enclosure 2). The archival research is currently underway and the fieldwork is currently being coordinated with the private land-owner.

As part of the testing plan, LSA has also developed a contingency evaluation plan for the evaluation of any additional resources that may be impacted as a result of any final engineering designs. The final engineering design will be used to refine the current POD to account for information gathered during the PEA studies and provides final locations for all proposed structures, equipment, and work areas. Once the final design has been released, the BLM and CPUC will reassess the cultural resources studies and determine if any additional evaluation needs must be addressed. Any additional evaluation that may become necessary as a result of the final design completion will be conducted according to the contingency developed in the evaluation plan.

Since the proposed Project is an upgrade to existing transmission lines and is located almost entirely within an existing ROW corridor, the BLM has defined the indirect effects APE as one-half-mile beyond the direct effects APE. ASM Affiliates is currently conducting additional

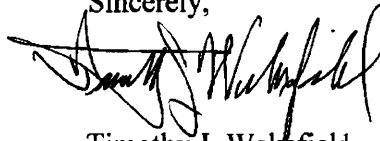
archival research to support NRHP eligibility evaluations for historic buildings and analyzing indirect effects from the proposed project to the location, setting, feeling, and association of known NRHP eligible or listed properties within the indirect effects APE. The archival research report will include known historic, archaeological, and tribal resources.

***Status of Tribal Consultation***

The BLM has notified Indian tribes about this undertaking and requested government-to-government consultation by letter on May 7, 2014. Fourteen federally recognized Indian tribes have been identified and invited to consult on the proposed Project, including the Agua Caliente Band of Cahuilla Indians, Augustine Band of Cahuilla Indians, Cabazon Band of Mission Indians, Cahuilla Band of Mission Indians, Morongo Band of Mission Indians, Pala Band of Mission Indians, Pauma/Yuima Band of Mission Indians, Pechanga Band of Mission Indians, Ramona Band of Mission Indians, Rincon Luiseno Band of Indians, San Manuel Band of Mission Indians, Soboba Band of Luiseno Indians, Torres-Martinez Desert Cahuilla Indians, and Twenty-nine Palms Band of Mission Indians.

As noted at the outset, the purpose of this letter is to provide notification to the ACHP of the proposed West of Devers Upgrade Project and invite the ACHP to participate with the BLM in the Section 106 review of the undertaking. We appreciate your attention to our request. If we can provide any information or address any questions regarding this undertaking, please do not hesitate to contact Tiffany Thomas, BLM Renewable Energy Archaeologist, at (951) 697-5365, or by e-mail at [tathomas@blm.gov](mailto:tathomas@blm.gov). You may also contact me at (760) 326-7100 or by e-mail at [twakefie@blm.gov](mailto:twakefie@blm.gov).

Sincerely,



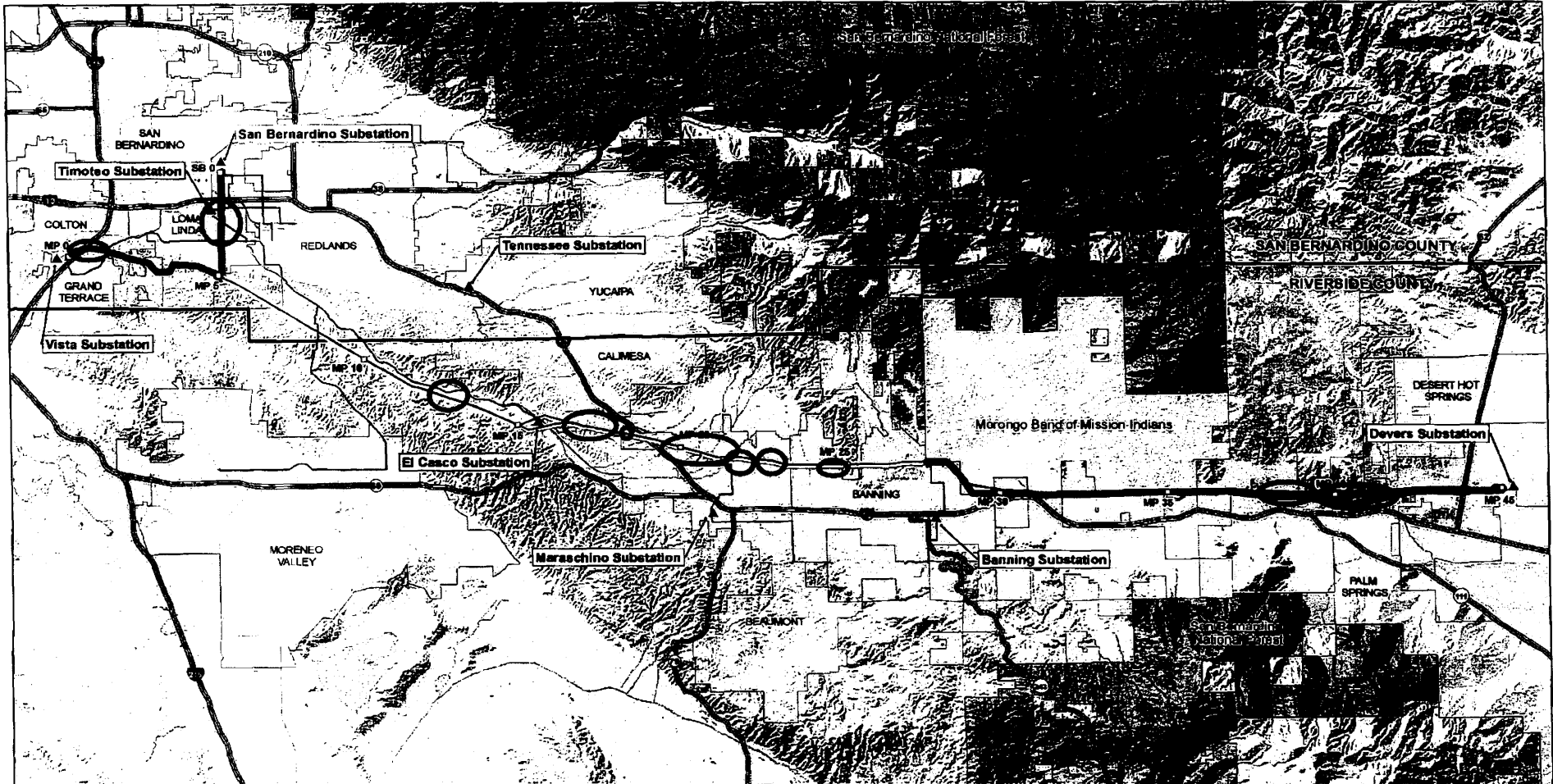
Timothy J. Wakefield  
Acting Field Manager

**Enclosures (3):**

- 1 – Proposed Project Map
- 2 - *Cultural Resources Assessment and Class III Inventory, West of Devers Project, Riverside and San Bernardino Counties, California* prepared by LSA (see CD)
- 3 – *Cultural Resources Evaluation Report and Testing Plan for Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California* prepared by LSA (see CD)

**Electronic CC:**

Frank McMenimen, Project Manager ([fmcmenimen@blm.gov](mailto:fmcmenimen@blm.gov))  
Greg Miller, Supervisory Projects Manager ([gmler@blm.gov](mailto:gmler@blm.gov))  
George Kline, Archaeologist, Palm Springs ([gkline@blm.gov](mailto:gkline@blm.gov))  
Tiffany Thomas, Renewable Energy Archaeologist ([tathomas@blm.gov](mailto:tathomas@blm.gov))  
Tony Overly, Archaeologist, California State Office ([soverly@blm.gov](mailto:soverly@blm.gov))



**Aspen**  
Environmental Group  
Sources: SCE 2013



0 1.5 3 6 Miles

**Components of Proposed Project**

- ▲ Substation
- Telecommunication Lines
- Distribution Lines
- Subtransmission Lines
- Milepost (e.g. MP 10, SB 0)
- County Line

**Legend**

**Proposed Project Segments\***

- Segment 1
- Segment 2
- Segment 3
- Segment 4
- Segment 5
- Segment 6

\*All segments include both 220 kV conductors and telecommunications lines.

**Land Jurisdiction**

- City Boundary
- Morongo Band of Mission Indians
- Bureau of Land Management
- U.S. Forest Service

WEST OF DEVERS UPGRADE PROJECT

**Alternatives Screening Report  
Figure 1  
Overview of Alternatives Considered**



Preserving America's Heritage

September 5, 2014

Timothy J. Wakefield  
Acting Field Manager  
Palm Springs-South Coast Field Office  
1201 Bird Center Drive  
Palm Springs, CA 92262-8001

**Ref: *Proposed West of Devers Transmission Line Upgrade Project  
Riverside and San Bernardino Counties, California***

Dear Mr. Wakefield:

On August 26, 2014 the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the referenced undertaking. We understand that the Bureau of Land Management (BLM) has not made a finding of effect for the undertaking referenced above in accordance with 36 CFR 800.5. The ACHP does not participate in Section 106 consultation unless adverse effects are identified. However, as an active participant in consultations regarding renewable energy development and transmission projects, we are working closely with BLM on many of these major infrastructure projects. Please note that the Section 106 regulations require that the agency apply the criteria of adverse effect in consultation with the State Historic Preservation Officer (SHPO)/Tribal Historic Preservation Officer (THPO), Indian tribes, and other consulting parties.

Should the BLM make a finding of adverse effect for this project, please notify us immediately. In addition, if we receive a request for participation from the SHPO, THPO, Indian tribe, or other parties with a demonstrated interest in the undertaking, we may choose to participate at that time. Additionally, should circumstances change, and you determine that our participation is needed to conclude the consultation process, please notify us.

Thank you for providing us with the opportunity to review this undertaking. If you have any questions or require further assistance of the ACHP, please contact Nancy J. Brown, ACHP's liaison to the BLM, at 202-517-0209 or by e-mail at [nbrown@achp.gov](mailto:nbrown@achp.gov).

Sincerely,

Caroline D. Hall  
Assistant Director  
Federal Property Management Section  
Office of Federal Agency Programs



United States Department of the Interior  
**BUREAU OF LAND MANAGEMENT**

Palm Springs-South Coast Field Office  
1201 Bird Center Drive  
Palm Springs, CA 92262-8001  
(760) 833-7100 Fax (760) 833-7199



*Visit us on the Internet at  
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**May 10, 2016**

*In Reply Refer To:*  
CACA 063162  
2831-03 (P)  
CAD000.06/CAD060

**CERTIFIED MAIL # 7014 2870 0001 5047 2006  
RETURN RECEIPT REQUESTED**

Julianne Polanco  
State Historic Preservation Officer  
California Department of Parks and Recreation  
Office of Historic Preservation  
1725 23<sup>rd</sup> Street, Suite 100  
Sacramento, CA 95816

RE: Continued Consultation for the for Southern California Edison Company's West of Devers  
Transmission Line Upgrade Project-Direct and Indirect Effects Determination

Dear Ms. Polanco:

The Bureau of Land Management (BLM) is continuing consultation on Southern California Edison's (SCE) proposed West of Devers Transmission Line Upgrade Project (WOD Project). The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Reservation. The BLM is the lead Federal agency for compliances with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA); the California Public Utilities Commission (CPUC) is the lead state agency for compliance with the California Environmental Quality Act (CEQA). In a letter dated May 20, 2014, the BLM notified the State Historic Preservation Officer (SHPO) about the proposed Project, initiated formal consultation on the Undertaking pursuant to 36 CFR Part 800, submitted the agency's determination of the Area of Potential Effect (APE) pursuant to 36 CFR Part 800.4(a)(1). In addition, the BLM requested to expedite the consultation process for the proposed Project, pursuant to 36 CFR 800.3(g) by combining our consultation on the identification efforts with our consultation on the determination of eligibility and finding of effect. In a letter dated July 28, 2014, the SHPO agreed with the delineation of the Project's APE, that expediting consultation is appropriate as long as consulting parties and the public have an adequate opportunity to express their views, and that the work plan constitutes a reasonable and good faith effort to identify historic properties within the APE.

The BLM submitted the evaluation reports for the WOD Project and requested your concurrence with determinations of National Register eligibility of potentially affected resources per 36 CFR 800.4(c)(2) and per 36 CFR 800.5(b) that this undertaking will have no adverse effect to historic properties in a letter dated October 7, 2015. The evaluation reports submitted in October 2015 did not address indirect impact to the five resources within the APE that have been determined eligible for listing in the NRHP, as

required per the APE for the WOD Project. The WOD Project APE for indirect effects will be no more than a half mile wide on each side of the direct effects APE. Indirect effects to location, setting, feeling, and association of properties eligible for or listed on the NRHP under Criteria A, B, or C and unevaluated or unrecorded resources identified by Indian tribes will be considered. These definitions will apply for the WOD project unless Native American or public consultation produces credible evidence of a need to expand the APE.

Williams (2016) evaluates the potential of indirect effects to occur to NRHP due to the WOD Project. To determine if any NRHP resources are located within a half mile of the direct APE, the GIS project file was analyzed. Two resources, P-33-01701 and P-33-07292, located within a half mile of the direct effects APE are listed on the NRHP. Five resources (P-33-02262, P-33-04213, P-11265, P-33-14871, and P-33-15004/07296) located within the direct effects APE have been determined eligible for listing in the NRHP. No direct impacts are to occur to these resources and/or historic features within the resource. The remaining resources located within the direct effects APE have been determined not eligible for listing in the NRHP. No other resources determined eligible to the NRHP are located within the APE for indirect effects.

In summary, the BLM has determined that the five resources (P-33-02262, P-33-04213, P-11265, P-33-14871, and P-33-15004/07296) within the direct APE have been determined eligible for listing in the NRHP. No direct impacts are to occur to these resources and/or historic features within the resource. An additional two resources (P-33-01701 and P-33-07292) located outside of the direct APE but within the indirect APE are listed on the NRHP. Williams (2016) evaluated these seven resources for indirect effects to location, setting, feeling, and association of properties eligible for or listed on the NRHP under Criteria A, B, or C and determined that no indirect effect will occur to these seven resources due to the WOD Project.

The BLM requests your concurrence with determinations of National Register eligibility of potentially affected resources per 36 CFR 800.4(c)(2) and per 36 CFR 800.5(b) and that this undertaking will have no adverse effect to historic properties. In addition, the BLM requests your concurrence that no indirect effects were identified to occur due the construction of the WOD Project. Furthermore, the BLM requests your concurrence that the construction of the WOD project will have no adverse effect to historic properties.

The BLM appreciates your attention to our requests and looks forward to consulting on the proposed Undertaking. If you have any questions, please contact George Kline, BLM Archaeologist at (760) 833-7135 or by email at [gkline@blm.gov](mailto:gkline@blm.gov). You may also contact me at (760) 326-7000 or by email at [j3willia@blm.gov](mailto:j3willia@blm.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "D. Herrema", with a stylized flourish at the end.

Douglas Herrema  
Acting Field Manager

References:

Williams, Audry. 2016. Assessment of Effects for Southern California Edison Company's West of Devers Upgrade Project Riverside and San Bernardino Counties, California.

**OFFICE OF HISTORIC PRESERVATION  
DEPARTMENT OF PARKS AND RECREATION**

1725 23<sup>rd</sup> Street, Suite 100  
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calshpo@parks.ca.gov  
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May 17, 2016

In Reply Refer To: BLM\_2014\_0523\_001

Douglas Herrema, Acting Field Manager  
United States Department of the Interior  
Bureau of Land Management  
Palm Springs-South Coast Field Office  
1201 Bird Center Drive  
Palm Springs, CA 92262-8001

Re: Section 106 Consultation for the West of Devers Transmission Line Upgrade Project,  
Determinations of Eligibility and Assessment of Adverse Effects

Dear Mr. Herrema:

Pursuant to 36 CFR Part 800 (as amended 8-05-04) regulations implementing Section 106 of the National Historic Preservation Act, the Bureau of Land Management (BLM), is continuing consultation, and pursuant to 36 CFR 800.4(c) is seeking my concurrence on its determinations of National Register eligibility of potentially affected resources within the Area of Potential Effects (APE) for the West of Devers Transmission Line Upgrade Project. The BLM is also seeking my concurrence, pursuant to 36 CFR Part 800.5(a) that this undertaking will not cause adverse effects to historic properties.

The BLM has reviewed an application for a right-of-way (ROW) grant and proposed Plan of Development (POD) submitted by Southern California Edison (SCE) to remove existing transmission lines and upgrade, operate, and maintain approximately 1.1 miles of two 220 kV transmission lines on BLM administered lands. The project is part of SCE's proposed upgrades to Segment 6 of the larger six segment West of Devers (WOD) Upgrade Project. The proposed project includes replacement of two existing single-circuit and one existing double-circuit 220 kV transmission lines and towers with two double-circuit 220 kV transmission lines and higher capacity equipment, relocation of two miles of 66 kV sub transmission lines and four miles of 12 kV distribution lines, upgrades to six existing substations, and installation of telecommunications equipment. The proposed Project crosses lands managed by the BLM, lands in private ownership, and the Morongo Band of Mission Indians Tribal Reservation. Most of the proposed Project is located within an existing SCE right-of-way (ROW) corridor.

The APE for direct effects includes the entire length of the proposed and existing ROW corridor (45 miles). The current ROW for the three existing 220kV transmission lines varies from 100 to 800 feet in width. The direct effects APE for the proposed 220kV transmission line corridor(s) includes the width of the existing ROW and any newly proposed ROW; a 50-foot-wide buffer on each side of the centerline of any existing road, 66kV sub transmission line, and distribution line that will be modified or newly developed for use by this proposed Project that otherwise extends beyond the 220kV transmission line corridor ROW; the land disturbance footprint for any staging area, materials yard, helicopter assembly yard; and the entire area of any substations modified for the proposed Project. The APE for indirect effects will be no more than ½-mile-wide on each side of the direct effects APE. Indirect effects to location, setting, feeling, and association of



BLM\_2014\_0523\_001

properties eligible for or listed on the National Register of Historic Places (NRHP) under Criterion A, B, or C, and unevaluated or unrecorded resources identified by Indian tribes were considered.

SCE has conducted a number of studies including a literature review, records search, and indirect effects analysis for ½ mile beyond the direct effects APE in which 423 cultural resources were identified. A Class III archaeological and built-environment inventory of the direct effects APE was conducted by LSA on behalf of SCE; 193 new cultural resources were identified. SCE have identified and evaluated all historic and archaeological resources within the APE (see table 1 on page 4 of this letter). Five resources within the APE have been recommended by the BLM to be eligible for listing in the NRHP and 65 have been recommended as ineligible. Adverse effects to historic properties will be avoided by implementing barriers and construction monitoring as protection measures.

Fourteen federally recognized Indian Tribes have participated in government-to-government consultations throughout the permitting process beginning on May 7, 2014. Tribes were invited to a June 17, 2015 consultation meeting to discuss the findings of identification and evaluation efforts and were further requested to provide formal comments by July 15, 2015. To date, no formal responses were received.

In addition to your letter, you have included the following reports in support of your findings:

- *Cultural Resources Evaluation and Testing Plan for Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California.* (LSA Associates, Inc., and Williams, 2014).
- *Archival Research and Evaluation Results of 33 Cultural Resources for Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California.* (Williams and Belcourt, 2014).
- *Cultural Resource Impact Assessment and Evaluation Report for Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California.* (Decarlo, Winslow, et al., 2015)
- *Results of Archaeological Testing at Guachama Rancheria, P-36-002311, CA-SBR-2311H, for the Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California.* (Decarlo, Winslow, Williams, 2015).
- *Engineering Refinements Survey and Recommendations of Eligibility of Cultural Resources for Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California.* (Belacourt and Williams, 2015).
- *Assessment of Effects For Southern California Edison Company's West of Devers Upgrade Project Riverside and San Bernardino Counties, California* (Williams, 2016).

Having reviewed your letter and supporting documentation, I concur with your determinations of eligibility pursuant to 36 CFR 800.4(c) and concur that the West of Devers Transmission Line Upgrade Project will not cause adverse effects pursuant to 36 CFR 800.5(a).

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Thank you for seeking my comments and for considering historic properties in planning your project. Please be advised that under certain circumstances, such as unanticipated discovery or a change in project description, the BLM may have additional future responsibilities for this undertaking under 36 CFR Part 800. If you require further information, please contact Brendon Greenaway of my staff at phone 916-445-7036 or email [brendon.greenaway@parks.ca.gov](mailto:brendon.greenaway@parks.ca.gov).

Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'J' followed by a horizontal line.

Julianne Polanco  
State Historic Preservation Officer

Electronic cc: George Kline, BLM

BLM\_2014\_0523\_001

**Table 1 Evaluations within APE**

Primary Number	Agency Recommended Evaluation (Criteria)	SHPO Response	Effects finding	SHPO Response
P-36-06847	Not eligible	Concur		
P-36-26219	Not eligible	Concur		
P-36-26220	Not eligible	Concur		
P-36-26031	Not eligible	Concur		
P-36-27712	Not eligible	Concur		
P-36-02311	Not eligible	Concur		
P-36-07168	Not eligible	Concur		
P-36-26221	Not eligible	Concur		
P-36-11624	Not eligible	Concur		
P-36-20240	Not eligible	Concur		
P-33-22344	Not eligible	Concur		
P-33-13431	Not eligible	Concur		
P-33-02262	<b>Eligible (B&amp;D)</b>	Concur	No effect	Concur
P-33-15004	<b>Eligible (A,B,&amp;D)</b>	Concur	No effect	Concur
P-33-15033	Not eligible	Concur		
P-33-13427	Not eligible	Concur		
P-33-15843	Not eligible	Concur		
P-33-22345	Not eligible	Concur		
P-33-14871	<b>Eligible (A&amp;C)</b>	Concur	No effect	Concur
P-33-07870	Not eligible	Concur		
P-33-16898	Not eligible	Concur		
P-33-22347	Not eligible	Concur		
P-33-22348	Not eligible	Concur		
P-33-22349	Not eligible	Concur		
P-33-22350	Not eligible	Concur		
P-33-22351	Not eligible	Concur		
P-33-22371	Not eligible	Concur		
P-33-22373	Not eligible	Concur		
P-33-22375	Not eligible	Concur		
P-33-16993	Not eligible	Concur		
P-33-22352	Not eligible	Concur		
P-33-22362	Not eligible	Concur		
P-33-22514	Not eligible	Concur		
P-33-22372	Not eligible	Concur		
P-33-01296	Not eligible	Concur		
P-33-04213	<b>Eligible (A,B,&amp;D)</b>	Concur	No effect	Concur
P-33-11265	<b>Eligible (A&amp;C)</b>	Concur	No effect	Concur
P-33-22364	Not eligible	Concur		
P-33-18123	Not eligible	Concur		
P-33-22353	Not eligible	Concur		
P-33-22357	Not eligible	Concur		

BLM\_2014\_0523\_001

P-33-22359	Not eligible	Concur		
P-33-22360	Not eligible	Concur		
P-33-22363	Not eligible	Concur		
P-33-22365	Not eligible	Concur		
P-33-22370	Not eligible	Concur		
P-33-22379	Not eligible	Concur		
P-33-22381	Not eligible	Concur		
P-33-22382	Not eligible	Concur		
P-33-22384	Not eligible	Concur		
P-33-22385	Not eligible	Concur		
P-33-22287	Not eligible	Concur		
P-33-22354	Not eligible	Concur		
P-33-22355	Not eligible	Concur		
P-33-22356	Not eligible	Concur		
P-33-22361	Not eligible	Concur		
P-33-22380	Not eligible	Concur		
P-33-24039	Not eligible	Concur		
P-33-22366	Not eligible	Concur		
P-33-22367	Not eligible	Concur		
P-33-24040	Not eligible	Concur		
P-36-26222	Not eligible	Concur		
P-33-22387	Not eligible	Concur		
P-33-22388	Not eligible	Concur		
P-33-22389	Not eligible	Concur		
P-33-15035	Not eligible	Concur		
P-33-23484	Not eligible	Concur		
P-33-15720	Not eligible	Concur		
P-33-09498	Not evaluated	Concur		
P-36-26224	Not eligible	Concur		
P-33-20721	Not eligible	Concur		

27 June 2013

Agua Caliente Band of Cahuilla Indians  
Patricia Tuck, Tribal Historic Preservation Officer  
5401 Dinah Shore Drive  
Palm Springs, CA 92264

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Ms. Tuck,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

SCE is conducting a cultural resources study of the proposed project in compliance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21083.2, and the associated implementing guidelines (CCR Title 14 Sections 15064.5, 15064.7, 15126.4(b), Appendix G Section V). Accordingly, the Native American Heritage Commission (NAHC) was asked for a Sacred Lands File search and a list of persons who might have information about the WOD Proposed Project area. You were identified by the NAHC as a possible source.

This letter requests your input on the proposed project. We invite your questions, comments, or concerns, and are available to meet if you would like to discuss this project in person. Providing comments now does not limit your ability to comment at a later time.

Please direct written replies to Dave Hanna, at the address given below. If you have any questions, please contact either of the following persons at SCE.

Dave Hanna, SCE Archaeologist  
626-462-8630 / dave.hanna@sce.com

Brian McDonald, SCE Tribal Liaison  
951-249-8467 / brian.mcdonald@sce.com

Thank you.



David C. Hanna, Jr., M.A., RPA  
SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure: Project Map

27 June 2013

Augustine Band of Cahuilla Mission Indians  
Karen Kupcha  
P.O. Box 849  
Coachella, CA 92236

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Ms. Kupcha,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

SCE is conducting a cultural resources study of the proposed project in compliance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21083.2, and the associated implementing guidelines (CCR Title 14 Sections 15064.5, 15064.7, 15126.4(b), Appendix G Section V). Accordingly, the Native American Heritage Commission (NAHC) was asked for a Sacred Lands File search and a list of persons who might have information about the WOD Proposed Project area. You were identified by the NAHC as a possible source.

This letter requests your input on the proposed project. We invite your questions, comments, or concerns, and are available to meet if you would like to discuss this project in person. Providing comments now does not limit your ability to comment at a later time.

Please direct written replies to Dave Hanna, at the address given below. If you have any questions, please contact either of the following persons at SCE.

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626-462-8630 / dave.hanna@sce.com

Brian McDonald, SCE Tribal Liaison  
951-249-8467 / brian.mcdonald@sce.com

Thank you.



David C. Hanna, Jr., M.A., RPA  
SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure: Project Map

27 June 2013

Augustine Band of Cahuilla Mission Indians  
Mary Ann Green, Chairperson  
P.O. Box 846  
Coachella, CA 92236

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Ms. Green,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

SCE is conducting a cultural resources study of the proposed project in compliance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21083.2, and the associated implementing guidelines (CCR Title 14 Sections 15064.5, 15064.7, 15126.4(b), Appendix G Section V). Accordingly, the Native American Heritage Commission (NAHC) was asked for a Sacred Lands File search and a list of persons who might have information about the WOD Proposed Project area. You were identified by the NAHC as a possible source.

This letter requests your input on the proposed project. We invite your questions, comments, or concerns, and are available to meet if you would like to discuss this project in person. Providing comments now does not limit your ability to comment at a later time.

Please direct written replies to Dave Hanna, at the address given below. If you have any questions, please contact either of the following persons at SCE.

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626-462-8630 / dave.hanna@sce.com

Brian McDonald, SCE Tribal Liaison  
951-249-8467 / brian.mcdonald@sce.com

Thank you.



David C. Hanna, Jr., M.A., RPA  
SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure: Project Map

27 June 2013

Cabazon Band of Mission Indians  
David Roosevelt, Chairperson  
84-245 Indio Springs  
Indio, CA 92203-3499

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Mr. Roosevelt,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

SCE is conducting a cultural resources study of the proposed project in compliance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21083.2, and the associated implementing guidelines (CCR Title 14 Sections 15064.5, 15064.7, 15126.4(b), Appendix G Section V). Accordingly, the Native American Heritage Commission (NAHC) was asked for a Sacred Lands File search and a list of persons who might have information about the WOD Proposed Project area. You were identified by the NAHC as a possible source.

This letter requests your input on the proposed project. We invite your questions, comments, or concerns, and are available to meet if you would like to discuss this project in person. Providing comments now does not limit your ability to comment at a later time.

Please direct written replies to Dave Hanna, at the address given below. If you have any questions, please contact either of the following persons at SCE.

Dave Hanna, SCE Archaeologist  
626-462-8630 / dave.hanna@sce.com

Brian McDonald, SCE Tribal Liaison  
951-249-8467 / brian.mcdonald@sce.com

Thank you.



David C. Hanna, Jr., M.A., RPA  
SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure: Project Map



27 June 2013

Cabazon Band of Mission Indians  
Judy Stapp, Director of Cultural Affairs  
84-245 Indio Springs  
Indio, CA 92203-3499

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Ms. Stapp,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

SCE is conducting a cultural resources study of the proposed project in compliance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21083.2, and the associated implementing guidelines (CCR Title 14 Sections 15064.5, 15064.7, 15126.4(b), Appendix G Section V). Accordingly, the Native American Heritage Commission (NAHC) was asked for a Sacred Lands File search and a list of persons who might have information about the WOD Proposed Project area. You were identified by the NAHC as a possible source.

This letter requests your input on the proposed project. We invite your questions, comments, or concerns, and are available to meet if you would like to discuss this project in person. Providing comments now does not limit your ability to comment at a later time.

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Brian McDonald, SCE Tribal Liaison  
951-249-8467 / brian.mcdonald@sce.com

Thank you.



David C. Hanna, Jr., M.A., RPA  
SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure: Project Map

27 June 2013

Cahuilla Band of Indians  
Luther Salgado, Chairperson  
PO Box 391760  
Anza, CA 92539

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Mr. Salgado,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

SCE is conducting a cultural resources study of the proposed project in compliance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21083.2, and the associated implementing guidelines (CCR Title 14 Sections 15064.5, 15064.7, 15126.4(b), Appendix G Section V). Accordingly, the Native American Heritage Commission (NAHC) was asked for a Sacred Lands File search and a list of persons who might have information about the WOD Proposed Project area. You were identified by the NAHC as a possible source.

This letter requests your input on the proposed project. We invite your questions, comments, or concerns, and are available to meet if you would like to discuss this project in person. Providing comments now does not limit your ability to comment at a later time.

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Brian McDonald, SCE Tribal Liaison  
951-249-8467 / brian.mcdonald@sce.com

Thank you.



David C. Hanna, Jr., M.A., RPA  
SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure: Project Map

27 June 2013

Gabrieleno/Tongva San Gabriel Band of Mission  
Anthony Morales, Chairperson  
PO Box 693  
San Gabriel, CA 91778

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Mr. Morales,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

SCE is conducting a cultural resources study of the proposed project in compliance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21083.2, and the associated implementing guidelines (CCR Title 14 Sections 15064.5, 15064.7, 15126.4(b), Appendix G Section V). Accordingly, the Native American Heritage Commission (NAHC) was asked for a Sacred Lands File search and a list of persons who might have information about the WOD Proposed Project area. You were identified by the NAHC as a possible source.

This letter requests your input on the proposed project. We invite your questions, comments, or concerns, and are available to meet if you would like to discuss this project in person. Providing comments now does not limit your ability to comment at a later time.

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626-462-8630 / dave.hanna@sce.com

Brian McDonald, SCE Tribal Liaison  
951-249-8467 / brian.mcdonald@sce.com

Thank you.



David C. Hanna, Jr., M.A., RPA  
SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure: Project Map

27 June 2013

Gabrielino Tongva Nation  
Sam Dunlap, Cultural Resources Director  
P.O. Box 86908  
Los Angeles, CA 90086

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Mr. Dunlap,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

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SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure: Project Map

27 June 2013

Los Coyotes Band of Mission Indians  
Shane Chapparosa, Chairman  
P.O. Box 189  
Warner, CA 92086

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Mr. Chapparosa,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

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SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure: Project Map

27 June 2013

Morongo Band of Mission Indians  
Michael Contreras, Cultural Heritage Prog.  
12700 Pumarra Road  
Banning, CA 92220

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Mr. Contreras,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

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SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure: Project Map

27 June 2013

Ernest H. Siva  
Morongo Band of Mission Indians Tribal Elder  
9570 Mias Canyon Road  
Banning, CA 92220

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Mr. Siva,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

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SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure: Project Map



27 June 2013

Morongo Band of Mission Indians  
Robert Martin, Chairperson  
12700 Pumarra Road  
Banning, CA 92220

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Mr. Martin,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

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SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure:      Project Map



27 June 2013

Pechanga Band of Mission Indians  
Paul Macarro, Cultural Resources Manager  
P.O. Box 1477  
Temecula, CA 92593

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Mr. Macarro,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

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SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure: Project Map

27 June 2013

Pechanga Cultural Resources Department  
Anna Hoover, Cultural Analyst  
P.O. Box 2183  
Temecula, CA 92593

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Ms. Hoover,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

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SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure: Project Map

27 June 2013

Ramona Band of Cahuilla Mission Indians  
Joseph Hamilton, Chairman  
P.O. Box 391670  
Anza, CA 92539

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Mr. Hamilton,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

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SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure: Project Map

27 June 2013

San Manuel Band of Mission Indians  
Carla Rodriguez, Chairwoman  
26569 Community Center Drive  
Highland, CA 92346

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Ms. Rodriguez,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

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SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure: Project Map

27 June 2013

San Manuel Band of Mission Indians  
Daniel McCarthy, M.S., Director-CRM Dept.  
26569 Community Center Drive  
Highland, CA 92346

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Mr. McCarthy,

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Monrovia, CA 91016

Enclosure: Project Map

27 June 2013

Santa Rosa Band of Mission Indians  
John Marcus, Chairman  
P.O. Box 391820  
Anza, CA 92539

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Mr. Marcus,

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Monrovia, CA 91016

Enclosure: Project Map

27 June 2013

Serrano Nation of Mission Indians  
Goldie Walker, Chairwoman  
P.O. Box 343  
Patton, CA 92369

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Ms. Walker,

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Monrovia, CA 91016

Enclosure:      Project Map



27 June 2013

Soboba Band of Luiseño Indians  
Joseph Ontiveros, Cultural Resource Department  
P.O. BOX 487  
San Jacinto, CA 92581

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Mr. Ontiveros,

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Enclosure: Project Map



27 June 2013

Torres-Martinez Desert Cahuilla Indians  
Diana L. Chihuahua, Vice Chairperson, Cultural  
P.O. Box 1160  
Thermal, CA 92274

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Ms. Chihuahua,

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Monrovia, CA 91016

Enclosure: Project Map

27 June 2013

Torres-Martinez Desert Cahuilla Indians  
Mary Resvaloso, Chairperson  
P.O. Box 1160  
Thermal, CA 92274

Subject: SCE West of Devers (WOD) Upgrade Project, Riverside and San Bernardino Counties, California

Dear Ms. Resvaloso,

The Southern California Edison Company (SCE) proposes to construct the West of Devers (WOD) Upgrade Project (Proposed Project) to increase the power transfer capability of the WOD 220 kV transmission lines between Devers, El Casco, Vista, and San Bernardino substations (see enclosed map). The Proposed Project is needed to facilitate the full deliverability of new electric generation resources being developed in eastern Riverside County, in an area designated by the California Independent System Operator (CAISO) for planning purposes as the Blythe and Desert Center areas. The Proposed Project, planned to be operational by 2020, would be constructed primarily within existing SCE rights-of-way (ROW), although some new ROW would be required.

SCE is conducting a cultural resources study of the proposed project in compliance with the California Environmental Quality Act (CEQA), Public Resources Code Section 21083.2, and the associated implementing guidelines (CCR Title 14 Sections 15064.5, 15064.7, 15126.4(b), Appendix G Section V). Accordingly, the Native American Heritage Commission (NAHC) was asked for a Sacred Lands File search and a list of persons who might have information about the WOD Proposed Project area. You were identified by the NAHC as a possible source.

This letter requests your input on the proposed project. We invite your questions, comments, or concerns, and are available to meet if you would like to discuss this project in person. Providing comments now does not limit your ability to comment at a later time.

Please direct written replies to Dave Hanna, at the address given below. If you have any questions, please contact either of the following persons at SCE.

Dave Hanna, SCE Archaeologist  
626-462-8630 / dave.hanna@sce.com

Brian McDonald, SCE Tribal Liaison  
951-249-8467 / brian.mcdonald@sce.com

Thank you.



David C. Hanna, Jr., M.A., RPA  
SCE Archaeologist  
1218 Fifth Avenue  
Monrovia, CA 91016

Enclosure: Project Map



**United States Department of the Interior  
BUREAU OF LAND MANAGEMENT**

Palm Springs-South Coast Field Office  
1201 Bird Center Drive  
Palm Springs, CA 92262-8001  
(760) 833-7100 Fax (760) 833-7199



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**In Reply Refer To:**  
CAD060/CAD000.06  
2831-03/2850(P)  
CACA-0063162

**MAY 20 2014**

**CERTIFIED MAIL 7102 3460 0000 2911 9632  
RETURN RECEIPT REQUESTED**

Mr. Jeff Grubbe  
Chairman  
Agua Caliente Band of Cahuilla Indians  
5401 Dinah Shore Drive  
Palm Springs, CA 92264

Dear Chairman Grubbe:

The Bureau of Land Management (BLM) is reviewing an application for a right-of-way (ROW) grant and proposed Plan of Development (POD) submitted by Southern California Edison (SCE) to upgrade, operate, and maintain approximately 1.1 miles of two 220 kV transmission lines on BLM administered lands, and remove some existing lines. The project is part of SCE's proposed upgrades to Segment 6 of the larger six-segment West of Devers (WOD) Upgrade Project. Through WOD, SCE proposes to upgrade 45 miles of two 220kV transmission lines between Palm Springs and San Bernardino, California (see Enclosure 1). The proposed project includes:

- replacement of two existing single-circuit and one existing double-circuit 220 kV transmission lines and towers with two double-circuit 220 kV transmission lines and higher capacity equipment;
- relocation of two miles of 66 kV sub-transmission lines and four miles of 12 kV distribution lines;
- upgrades to six existing substations; and
- installation of telecommunications equipment.

The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. Most of the proposed Project is located within an existing SCE ROW corridor.

Under Federal law, the BLM is responsible for processing ROW applications for facilities proposed to be constructed and operated on public lands. In processing the applications, the BLM must comply with the requirements of the National Environmental Policy Act (NEPA), which requires that Federal agencies reviewing projects under their jurisdiction consider the environmental impacts associated with their construction and operation. An Environmental

Impact Statement/Environmental Impact Report (EIS/EIR) will be prepared to evaluate the impacts of the proposed WOD Project. The California Public Utilities Commission (CPUC) is the State lead agency for the preparation of the EIR in compliance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et. seq.), CEQA implementing guidelines (California Code of Regulations [CCR] Title 14, Section 15000 et. seq.). The BLM is the Federal lead agency for the preparation of the EIS in compliance with the requirements of the NEPA, the Council on Environmental Quality (CEQ) regulation for implementing NEPA (40 Code of Federal Regulations [CFR] 1500 – 1508), and the BLM NEPA guidance handbook (H-1790-1).

A joint EIS/EIR will be prepared to evaluate the proposed Project. The BLM is also the Federal lead agency for compliance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR Part 800). The proposed Project will concurrently be analyzed for its potential to affect historic properties as required by Section 106 of the NHPA, and we will utilize the public review process described in the NEPA to partially meet our public involvement responsibilities under the NHPA. In addition, Section 106 documentation for this proposed Project will be published on our website at <http://www.blm.gov/ca/st/en/fo/cdd.html>.

Consistent with the principles stated in Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments, November 6, 2000), and the Executive Memorandum of April 29, 1994, (Government to Government Relations with Native American Tribal Governments), we are contacting you at the earliest stages of project review and seeking your views and comments, particularly with regard to any issues that may affect resources that are important to your Tribe. This letter serves to provide initial notification of the proposed Project, explain the role of the BLM, and invite the Agua Caliente Band of Cahuilla Indians to enter into government-to-government consultation. The BLM will update the Tribe on the proposed Project throughout the review process, unless the Tribe has no further interest in consulting on this proposed Project. We would request that the Tribe inform us if it has no interest in this proposed Project or entering into consultation. If you are aware of any other Tribes, individuals, or affiliated Native American organizations that should be contacted regarding this proposed Project, please let us know. A list of other Tribal Government officials receiving this letter is provided for your reference (Enclosure 2).

Specific to Section 106 of the NHPA, the implementing regulation at 36 CFR 800 requires the BLM to consult with Indian tribes that attach religious or cultural significance to historic properties that may be affected by an undertaking. We request your assistance in identifying any issues or concerns the Tribe may have about the proposed Project, including identifying places of religious and cultural significance that might be affected by the proposed Project. To facilitate government-to-government consultation on this proposed Project for the purposes of Section 106 and to meet the requirements of the regulations, the BLM also requests that the Agua Caliente Band of Cahuilla Indians tribal government identify those tribal representatives who have been designated to consult with the BLM on this proposed Project.

#### **Project Status**

SCE has developed a Proponents Environmental Assessment as part of the CPUC CEQA review requirements. SCE has contracted with LSA, an environmental consultant, to identify and

evaluate all historic and archaeological resources within the APE in support of the Proponents Environmental Assessment. To date, LSA has conducted a literature review, records search, and BLM Class III archaeological and built environment survey of the direct effects APE. The information gathered during the development of the Proponents Environmental Assessment was incorporated into the POD that was submitted to the BLM. The BLM is currently reviewing the draft Class III report prepared by LSA.

LSA is currently developing an evaluation plan for one archaeological site (CA-SBR-2311H/Guachama Rancheria) that requires additional archaeological testing in order to further evaluate. LSA is also developing a contingency evaluation plan for the evaluation of any additional resources that may be impacted based on a planned final project engineering design that is scheduled to be completed by June, 2014. This plan will further refine the current POD to account for information gathered during the Proponents Environmental Assessment studies and provide final locations for all proposed structures, equipment, and work areas. Once the final design has been released, the BLM and CPUC will reassess the cultural resources studies and determine if any additional evaluation needs must be addressed. Any additional evaluation that may become necessary, as a result of the final design completion, will be conducted according to the contingency developed in the evaluation plan.

The BLM has also requested that SCE conduct an ethnographic literature review and indirect effects analysis for the proposed Project. Since the proposed Project is an upgrade to existing transmission lines and is located almost entirely within an existing ROW corridor, the BLM has defined the indirect effects APE as one-half-mile beyond the direct effects APE. SCE's contractor will be analyzing indirect effects from the proposed Project to the location, setting, feeling, and association of known NRHP eligible or listed properties within the indirect effects APE. This study will include known historic, archaeological, and tribal resources.

If you would like to designate a representative to consult with the BLM, know of any other Tribes that should be contacted regarding this proposed Project, or have any questions or concerns about the proposed Project please contact:

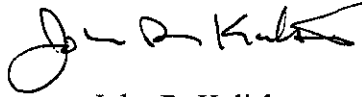
Brian Paul, Project Manager  
Renewable Energy Coordination Office  
Bureau of Land Management, California Desert District Office  
1661 S. 4<sup>th</sup> Street  
El Centro, CA 92243  
Phone: 760-337-4445  
Email: [rpaul@blm.gov](mailto:rpaul@blm.gov)

You can also contact Tiffany Thomas, Renewable Energy Coordination Office Archaeologist and Cultural Resources lead for the proposed Project, by telephone at (951) 697-5365, or email at [tathomas@blm.gov](mailto:tathomas@blm.gov).

We look forward to hearing from you regarding your interest in the West of Devers Upgrade Project and our invitation to initiate government-to-government consultation. If you have

additional questions or we can provide any clarification, please do not hesitate to contact us. I can be reached by telephone at (760) 326-7000 or by e-mail at [jkalish@blm.gov](mailto:jkalish@blm.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "John R. Kalish", with a stylized, flowing script.

John R. Kalish  
Field Manager

Electronic CC:

Greg Miller ([gmler@blm.gov](mailto:gmler@blm.gov))

Brian Paul ([rpaul@blm.gov](mailto:rpaul@blm.gov))

Tiffany Thomas ([tathomas@blm.gov](mailto:tathomas@blm.gov))

George Kline ([gkline@blm.gov](mailto:gkline@blm.gov))

Mark Purdy ([mpurdy@blm.gov](mailto:mpurdy@blm.gov))

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2 - Tribal Contact List



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CAD060/CAD000.06  
2831-03/2850(P)  
CACA-0063162

**MAY 20 2014**

**CERTIFIED MAIL 7012 3460 0000 2911 9649  
RETURN RECEIPT REQUESTED**

Ms. Mary Ann Green  
Chairwoman  
Augustine Band of Cahuilla Indians  
P.O. Box 846  
Coachella, CA 92236

Dear Chairwoman Green:

The Bureau of Land Management (BLM) is reviewing an application for a right-of-way (ROW) grant and proposed Plan of Development (POD) submitted by Southern California Edison (SCE) to upgrade, operate, and maintain approximately 1.1 miles of two 220 kV transmission lines on BLM administered lands, and remove some existing lines. The project is part of SCE's proposed upgrades to Segment 6 of the larger six-segment West of Devers (WOD) Upgrade Project. Through WOD, SCE proposes to upgrade 45 miles of two 220kV transmission lines between Palm Springs and San Bernardino, California (see Enclosure 1). The proposed project includes:

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- relocation of two miles of 66 kV sub-transmission lines and four miles of 12 kV distribution lines;
- upgrades to six existing substations; and
- installation of telecommunications equipment.

The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. Most of the proposed Project is located within an existing SCE ROW corridor.

Under Federal law, the BLM is responsible for processing ROW applications for facilities proposed to be constructed and operated on public lands. In processing the applications, the BLM must comply with the requirements of the National Environmental Policy Act (NEPA), which requires that Federal agencies reviewing projects under their jurisdiction consider the environmental impacts associated with their construction and operation. An Environmental

Impact Statement/Environmental Impact Report (EIS/EIR) will be prepared to evaluate the impacts of the proposed WOD Project. The California Public Utilities Commission (CPUC) is the State lead agency for the preparation of the EIR in compliance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et. seq.), CEQA implementing guidelines (California Code of Regulations [CCR] Title 14, Section 15000 et. seq.). The BLM is the Federal lead agency for the preparation of the EIS in compliance with the requirements of the NEPA, the Council on Environmental Quality (CEQ) regulation for implementing NEPA (40 Code of Federal Regulations [CFR] 1500 – 1508), and the BLM NEPA guidance handbook (H-1790-1).

A joint EIS/EIR will be prepared to evaluate the proposed Project. The BLM is also the Federal lead agency for compliance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR Part 800). The proposed Project will concurrently be analyzed for its potential to affect historic properties as required by Section 106 of the NHPA, and we will utilize the public review process described in the NEPA to partially meet our public involvement responsibilities under the NHPA. In addition, Section 106 documentation for this proposed Project will be published on our website at <http://www.blm.gov/ca/st/en/fo/cdd.html>.

Consistent with the principles stated in Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments, November 6, 2000), and the Executive Memorandum of April 29, 1994, (Government to Government Relations with Native American Tribal Governments), we are contacting you at the earliest stages of project review and seeking your views and comments, particularly with regard to any issues that may affect resources that are important to your Tribe. This letter serves to provide initial notification of the proposed Project, explain the role of the BLM, and invite the Augustine Band of Cahuilla Indians to enter into government-to-government consultation. The BLM will update the Tribe on the proposed Project throughout the review process, unless the Tribe has no further interest in consulting on this proposed Project. We would request that the Tribe inform us if it has no interest in this proposed Project or entering into consultation. If you are aware of any other Tribes, individuals, or affiliated Native American organizations that should be contacted regarding this proposed Project, please let us know. A list of other Tribal Government officials receiving this letter is provided for your reference (Enclosure 2).

Specific to Section 106 of the NHPA, the implementing regulation at 36 CFR 800 requires the BLM to consult with Indian tribes that attach religious or cultural significance to historic properties that may be affected by an undertaking. We request your assistance in identifying any issues or concerns the Tribe may have about the proposed Project, including identifying places of religious and cultural significance that might be affected by the proposed Project. To facilitate government-to-government consultation on this proposed Project for the purposes of Section 106 and to meet the requirements of the regulations, the BLM also requests that the Augustine Band of Cahuilla Indians tribal government identify those tribal representatives who have been designated to consult with the BLM on this proposed Project.

#### **Project Status**

SCE has developed a Proponents Environmental Assessment as part of the CPUC CEQA review requirements. SCE has contracted with LSA, an environmental consultant, to identify and



evaluate all historic and archaeological resources within the APE in support of the Proponents Environmental Assessment. To date, LSA has conducted a literature review, records search, and BLM Class III archaeological and built environment survey of the direct effects APE. The information gathered during the development of the Proponents Environmental Assessment was incorporated into the POD that was submitted to the BLM. The BLM is currently reviewing the draft Class III report prepared by LSA.

LSA is currently developing an evaluation plan for one archaeological site (CA-SBR-2311H/Guachama Rancheria) that requires additional archaeological testing in order to further evaluate. LSA is also developing a contingency evaluation plan for the evaluation of any additional resources that may be impacted based on a planned final project engineering design that is scheduled to be completed by June, 2014. This plan will further refine the current POD to account for information gathered during the Proponents Environmental Assessment studies and provide final locations for all proposed structures, equipment, and work areas. Once the final design has been released, the BLM and CPUC will reassess the cultural resources studies and determine if any additional evaluation needs must be addressed. Any additional evaluation that may become necessary, as a result of the final design completion, will be conducted according to the contingency developed in the evaluation plan.

The BLM has also requested that SCE conduct an ethnographic literature review and indirect effects analysis for the proposed Project. Since the proposed Project is an upgrade to existing transmission lines and is located almost entirely within an existing ROW corridor, the BLM has defined the indirect effects APE as one-half-mile beyond the direct effects APE. SCE's contractor will be analyzing indirect effects from the proposed Project to the location, setting, feeling, and association of known NRHP eligible or listed properties within the indirect effects APE. This study will include known historic, archaeological, and tribal resources.

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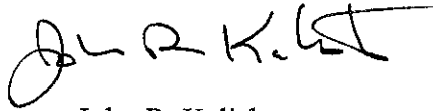
Brian Paul, Project Manager  
Renewable Energy Coordination Office  
Bureau of Land Management, California Desert District Office  
1661 S. 4<sup>th</sup> Street  
El Centro, CA 92243  
Phone: 760-337-4445  
Email: [rpaul@blm.gov](mailto:rpaul@blm.gov)

You can also contact Tiffany Thomas, Renewable Energy Coordination Office Archaeologist and Cultural Resources lead for the proposed Project, by telephone at (951) 697-5365, or email at [tathomas@blm.gov](mailto:tathomas@blm.gov).

We look forward to hearing from you regarding your interest in the West of Devers Upgrade Project and our invitation to initiate government-to-government consultation. If you have

additional questions or we can provide any clarification, please do not hesitate to contact us. I can be reached by telephone at (760) 326-7000 or by e-mail at [jkalish@blm.gov](mailto:jkalish@blm.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "John R. Kalish", with a stylized flourish at the end.

John R. Kalish  
Field Manager

Electronic CC:

Greg Miller ([gmler@blm.gov](mailto:gmler@blm.gov))

Brian Paul ([rpaul@blm.gov](mailto:rpaul@blm.gov))

Tiffany Thomas ([tathomas@blm.gov](mailto:tathomas@blm.gov))

George Kline ([gkline@blm.gov](mailto:gkline@blm.gov))

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Enclosures:

1 - Project Area Map

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**United States Department of the Interior  
BUREAU OF LAND MANAGEMENT**

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2831-03/2850(P)  
CACA-0063162

**MAY 20 2014**

**CERTIFIED MAIL 7012 3460 0000 2912 2465  
RETURN RECEIPT REQUESTED**

Mr. Doug Welmas  
Chairman  
Cabazon Band of Mission Indians  
84-245 Indio Springs Parkway  
Indio, CA 92203-3449

Dear Chairman Welmas:

The Bureau of Land Management (BLM) is reviewing an application for a right-of-way (ROW) grant and proposed Plan of Development (POD) submitted by Southern California Edison (SCE) to upgrade, operate, and maintain approximately 1.1 miles of two 220 kV transmission lines on BLM administered lands, and remove some existing lines. The project is part of SCE's proposed upgrades to Segment 6 of the larger six-segment West of Devers (WOD) Upgrade Project. Through WOD, SCE proposes to upgrade 45 miles of two 220kV transmission lines between Palm Springs and San Bernardino, California (see Enclosure 1). The proposed project includes:

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- upgrades to six existing substations; and
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The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. Most of the proposed Project is located within an existing SCE ROW corridor.

Under Federal law, the BLM is responsible for processing ROW applications for facilities proposed to be constructed and operated on public lands. In processing the applications, the BLM must comply with the requirements of the National Environmental Policy Act (NEPA), which requires that Federal agencies reviewing projects under their jurisdiction consider the environmental impacts associated with their construction and operation. An Environmental

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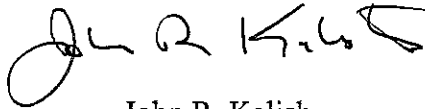
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John R. Kalish  
Field Manager

Electronic CC:

Greg Miller ([gmler@blm.gov](mailto:gmler@blm.gov))

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Tiffany Thomas ([tathomas@blm.gov](mailto:tathomas@blm.gov))

George Kline ([gkline@blm.gov](mailto:gkline@blm.gov))

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**United States Department of the Interior  
BUREAU OF LAND MANAGEMENT**

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**MAY 20 2014**

**In Reply Refer To:**  
CAD060/CAD000.06  
2831-03/2850(P)  
CACA-0063162

**CERTIFIED MAIL 7012 3460 0000 2912 1550  
RETURN RECEIPT REQUESTED**

Mr. Luther Salgado, Sr.  
Chairman  
Cahuilla Band of Mission Indians  
P.O. Box 391760  
Anza, CA 92539-1760

Dear Chairman Salgado:

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If you would like to designate a representative to consult with the BLM, know of any other Tribes that should be contacted regarding this proposed Project, or have any questions or concerns about the proposed Project please contact:

Brian Paul, Project Manager  
Renewable Energy Coordination Office  
Bureau of Land Management, California Desert District Office  
1661 S. 4<sup>th</sup> Street  
El Centro, CA 92243  
Phone: 760-337-4445  
Email: [rpaul@blm.gov](mailto:rpaul@blm.gov)

You can also contact Tiffany Thomas, Renewable Energy Coordination Office Archaeologist and Cultural Resources lead for the proposed Project, by telephone at (951) 697-5365, or email at [tathomas@blm.gov](mailto:tathomas@blm.gov).

We look forward to hearing from you regarding your interest in the West of Devers Upgrade Project and our invitation to initiate government-to-government consultation. If you have

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Sincerely,

A handwritten signature in black ink, appearing to read "John R. Kalish". The signature is stylized with a large initial "J" and a prominent "K".

John R. Kalish  
Field Manager

Electronic CC:

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United States Department of the Interior  
**BUREAU OF LAND MANAGEMENT**

Palm Springs-South Coast Field Office  
1201 Bird Center Drive  
Palm Springs, CA 92262-8001  
(760) 833-7100 Fax (760) 833-7199



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In Reply Refer To:  
CAD060/CAD000.06  
2831-03/2850(P)  
CACA-0063162

**MAY 20 2014**

**CERTIFIED MAIL 7012 3460 0000 2912 1567**  
**RETURN RECEIPT REQUESTED**

Mr. Robert Martin  
Chairman  
Morongo Band of Mission Indians  
12700 Pumarra Rd.  
Banning, CA 92220

Dear Chairman Martin:

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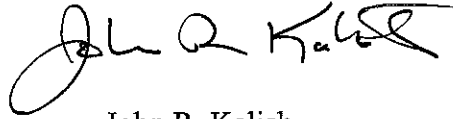
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Renewable Energy Coordination Office  
Bureau of Land Management, California Desert District Office  
1661 S. 4<sup>th</sup> Street  
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Sincerely,

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John R. Kalish  
Field Manager

Electronic CC:

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**United States Department of the Interior  
BUREAU OF LAND MANAGEMENT**

Palm Springs-South Coast Field Office  
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Palm Springs, CA 92262-8001  
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**In Reply Refer To:**  
CAD060/CAD000.06  
2831-03/2850(P)  
CACA-0063162

**MAY 20 2014**

**CERTIFIED MAIL 7012 3460 0000 2912 1574  
RETURN RECEIPT REQUESTED**

Mr. Robert Smith  
Chairman  
Pala Band of Mission Indians  
12196 Pala Mission Road  
Pala, CA 92059

Dear Chairman Smith:

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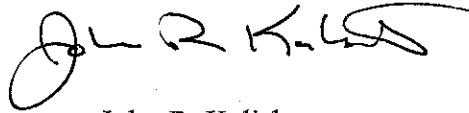
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John R. Kalish  
Field Manager

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Tiffany Thomas ([tathomas@blm.gov](mailto:tathomas@blm.gov))

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**MAY 20 2014**

**In Reply Refer To:**  
CAD060/CAD000.06  
2831-03/2850(P)  
CACA-0063162

**CERTIFIED MAIL 7012 3460 0000 2912 1581  
RETURN RECEIPT REQUESTED**

Mr. Randall Majel  
Chairman  
Pauma/Yuima Band of Mission Indians  
1010 Reservation Road  
Pauma Valley, CA 92061

Dear Chairman Majel:

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If you would like to designate a representative to consult with the BLM, know of any other Tribes that should be contacted regarding this proposed Project, or have any questions or concerns about the proposed Project please contact:

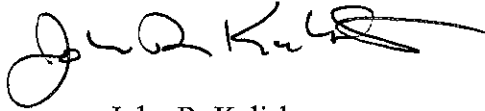
Brian Paul, Project Manager  
Renewable Energy Coordination Office  
Bureau of Land Management, California Desert District Office  
1661 S. 4<sup>th</sup> Street  
El Centro, CA 92243  
Phone: 760-337-4445  
Email: [rpaul@blm.gov](mailto:rpaul@blm.gov)

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We look forward to hearing from you regarding your interest in the West of Devers Upgrade Project and our invitation to initiate government-to-government consultation. If you have

additional questions or we can provide any clarification, please do not hesitate to contact us. I can be reached by telephone at (760) 326-7000 or by e-mail at [jkalish@blm.gov](mailto:jkalish@blm.gov).

Sincerely,

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John R. Kalish  
Field Manager

Electronic CC:

Greg Miller ([gmler@blm.gov](mailto:gmler@blm.gov))

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United States Department of the Interior  
**BUREAU OF LAND MANAGEMENT**

Palm Springs-South Coast Field Office  
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**In Reply Refer To:**  
CAD060/CAD000.06  
2831-03/2850(P)  
CACA-0063162

**MAY 20 2014**

**CERTIFIED MAIL 7012 3460 0000 2912 1598**  
**RETURN RECEIPT REQUESTED**

Mr. Mark Macarro  
Chairman  
Pechanga Band of Mission Indians  
P.O. Box 1477  
Temecula, CA 92593

Dear Chairman Macarro:

The Bureau of Land Management (BLM) is reviewing an application for a right-of-way (ROW) grant and proposed Plan of Development (POD) submitted by Southern California Edison (SCE) to upgrade, operate, and maintain approximately 1.1 miles of two 220 kV transmission lines on BLM administered lands, and remove some existing lines. The project is part of SCE's proposed upgrades to Segment 6 of the larger six-segment West of Devers (WOD) Upgrade Project. Through WOD, SCE proposes to upgrade 45 miles of two 220kV transmission lines between Palm Springs and San Bernardino, California (see Enclosure 1). The proposed project includes:

- replacement of two existing single-circuit and one existing double-circuit 220 kV transmission lines and towers with two double-circuit 220 kV transmission lines and higher capacity equipment;
- relocation of two miles of 66 kV sub-transmission lines and four miles of 12 kV distribution lines;
- upgrades to six existing substations; and
- installation of telecommunications equipment.

The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. Most of the proposed Project is located within an existing SCE ROW corridor.

Under Federal law, the BLM is responsible for processing ROW applications for facilities proposed to be constructed and operated on public lands. In processing the applications, the BLM must comply with the requirements of the National Environmental Policy Act (NEPA), which requires that Federal agencies reviewing projects under their jurisdiction consider the environmental impacts associated with their construction and operation. An Environmental

Impact Statement/Environmental Impact Report (EIS/EIR) will be prepared to evaluate the impacts of the proposed WOD Project. The California Public Utilities Commission (CPUC) is the State lead agency for the preparation of the EIR in compliance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et. seq.), CEQA implementing guidelines (California Code of Regulations [CCR] Title 14, Section 15000 et. seq.). The BLM is the Federal lead agency for the preparation of the EIS in compliance with the requirements of the NEPA, the Council on Environmental Quality (CEQ) regulation for implementing NEPA (40 Code of Federal Regulations [CFR] 1500 – 1508), and the BLM NEPA guidance handbook (H-1790-1).

A joint EIS/EIR will be prepared to evaluate the proposed Project. The BLM is also the Federal lead agency for compliance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR Part 800). The proposed Project will concurrently be analyzed for its potential to affect historic properties as required by Section 106 of the NHPA, and we will utilize the public review process described in the NEPA to partially meet our public involvement responsibilities under the NHPA. In addition, Section 106 documentation for this proposed Project will be published on our website at <http://www.blm.gov/ca/st/en/fo/cdd.html>.

Consistent with the principles stated in Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments, November 6, 2000), and the Executive Memorandum of April 29, 1994, (Government to Government Relations with Native American Tribal Governments), we are contacting you at the earliest stages of project review and seeking your views and comments, particularly with regard to any issues that may affect resources that are important to your Tribe. This letter serves to provide initial notification of the proposed Project, explain the role of the BLM, and invite the Pechanga Band of Mission Indians to enter into government-to-government consultation. The BLM will update the Tribe on the proposed Project throughout the review process, unless the Tribe has no further interest in consulting on this proposed Project. We would request that the Tribe inform us if it has no interest in this proposed Project or entering into consultation. If you are aware of any other Tribes, individuals, or affiliated Native American organizations that should be contacted regarding this proposed Project, please let us know. A list of other Tribal Government officials receiving this letter is provided for your reference (Enclosure 2).

Specific to Section 106 of the NHPA, the implementing regulation at 36 CFR 800 requires the BLM to consult with Indian tribes that attach religious or cultural significance to historic properties that may be affected by an undertaking. We request your assistance in identifying any issues or concerns the Tribe may have about the proposed Project, including identifying places of religious and cultural significance that might be affected by the proposed Project. To facilitate government-to-government consultation on this proposed Project for the purposes of Section 106 and to meet the requirements of the regulations, the BLM also requests that the Pechanga Band of Mission Indians tribal government identify those tribal representatives who have been designated to consult with the BLM on this proposed Project.

#### **Project Status**

SCE has developed a Proponents Environmental Assessment as part of the CPUC CEQA review requirements. SCE has contracted with LSA, an environmental consultant, to identify and



evaluate all historic and archaeological resources within the APE in support of the Proponents Environmental Assessment. To date, LSA has conducted a literature review, records search, and BLM Class III archaeological and built environment survey of the direct effects APE. The information gathered during the development of the Proponents Environmental Assessment was incorporated into the POD that was submitted to the BLM. The BLM is currently reviewing the draft Class III report prepared by LSA.

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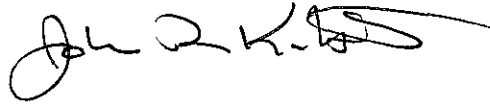
Brian Paul, Project Manager  
Renewable Energy Coordination Office  
Bureau of Land Management, California Desert District Office  
1661 S. 4<sup>th</sup> Street  
El Centro, CA 92243  
Phone: 760-337-4445  
Email: [rpaul@blm.gov](mailto:rpaul@blm.gov)

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We look forward to hearing from you regarding your interest in the West of Devers Upgrade Project and our invitation to initiate government-to-government consultation. If you have

additional questions or we can provide any clarification, please do not hesitate to contact us. I can be reached by telephone at (760) 326-7000 or by e-mail at [jkalish@blm.gov](mailto:jkalish@blm.gov).

Sincerely,

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John R. Kalish  
Field Manager

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**MAY 20 2014**

**In Reply Refer To:**  
CAD060/CAD000.06  
2831-03/2850(P)  
CACA-0063162

**CERTIFIED MAIL 7012 3460 0000 2912 1604  
RETURN RECEIPT REQUESTED**

Mr. Joseph Hamilton  
Chairman  
Ramona Band of Mission Indians  
P.O. Box 391372  
Anza, CA 92539

Dear Chairman Hamilton:

The Bureau of Land Management (BLM) is reviewing an application for a right-of-way (ROW) grant and proposed Plan of Development (POD) submitted by Southern California Edison (SCE) to upgrade, operate, and maintain approximately 1.1 miles of two 220 kV transmission lines on BLM administered lands, and remove some existing lines. The project is part of SCE's proposed upgrades to Segment 6 of the larger six-segment West of Devers (WOD) Upgrade Project. Through WOD, SCE proposes to upgrade 45 miles of two 220kV transmission lines between Palm Springs and San Bernardino, California (see Enclosure 1). The proposed project includes:

- replacement of two existing single-circuit and one existing double-circuit 220 kV transmission lines and towers with two double-circuit 220 kV transmission lines and higher capacity equipment;
- relocation of two miles of 66 kV sub-transmission lines and four miles of 12 kV distribution lines;
- upgrades to six existing substations; and
- installation of telecommunications equipment.

The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. Most of the proposed Project is located within an existing SCE ROW corridor.

Under Federal law, the BLM is responsible for processing ROW applications for facilities proposed to be constructed and operated on public lands. In processing the applications, the BLM must comply with the requirements of the National Environmental Policy Act (NEPA), which requires that Federal agencies reviewing projects under their jurisdiction consider the environmental impacts associated with their construction and operation. An Environmental

Impact Statement/Environmental Impact Report (EIS/EIR) will be prepared to evaluate the impacts of the proposed WOD Project. The California Public Utilities Commission (CPUC) is the State lead agency for the preparation of the EIR in compliance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et. seq.), CEQA implementing guidelines (California Code of Regulations [CCR] Title 14, Section 15000 et. seq.). The BLM is the Federal lead agency for the preparation of the EIS in compliance with the requirements of the NEPA, the Council on Environmental Quality (CEQ) regulation for implementing NEPA (40 Code of Federal Regulations [CFR] 1500 – 1508), and the BLM NEPA guidance handbook (H-1790-1).

A joint EIS/EIR will be prepared to evaluate the proposed Project. The BLM is also the Federal lead agency for compliance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR Part 800). The proposed Project will concurrently be analyzed for its potential to affect historic properties as required by Section 106 of the NHPA, and we will utilize the public review process described in the NEPA to partially meet our public involvement responsibilities under the NHPA. In addition, Section 106 documentation for this proposed Project will be published on our website at <http://www.blm.gov/ca/st/en/fo/cdd.html>.

Consistent with the principles stated in Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments, November 6, 2000), and the Executive Memorandum of April 29, 1994, (Government to Government Relations with Native American Tribal Governments), we are contacting you at the earliest stages of project review and seeking your views and comments, particularly with regard to any issues that may affect resources that are important to your Tribe. This letter serves to provide initial notification of the proposed Project, explain the role of the BLM, and invite the Ramona Band of Mission Indians to enter into government-to-government consultation. The BLM will update the Tribe on the proposed Project throughout the review process, unless the Tribe has no further interest in consulting on this proposed Project. We would request that the Tribe inform us if it has no interest in this proposed Project or entering into consultation. If you are aware of any other Tribes, individuals, or affiliated Native American organizations that should be contacted regarding this proposed Project, please let us know. A list of other Tribal Government officials receiving this letter is provided for your reference (Enclosure 2).

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#### **Project Status**

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evaluate all historic and archaeological resources within the APE in support of the Proponents Environmental Assessment. To date, LSA has conducted a literature review, records search, and BLM Class III archaeological and built environment survey of the direct effects APE. The information gathered during the development of the Proponents Environmental Assessment was incorporated into the POD that was submitted to the BLM. The BLM is currently reviewing the draft Class III report prepared by LSA.

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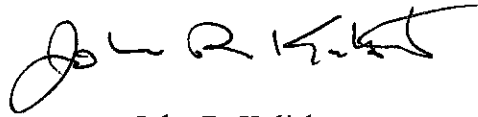
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John R. Kalish  
Field Manager

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2831-03/2850(P)  
CACA-0063162

MAY 20 2014

**CERTIFIED MAIL 7012 3460 0000 2912 1611  
RETURN RECEIPT REQUESTED**

Mr. Frederick "Bo" Mazzetti  
Chairman  
Rincon Luiseno Band of Indians  
1 West Tribal Road  
Valley Center, CA 92082

Dear Chairman Mazzetti:

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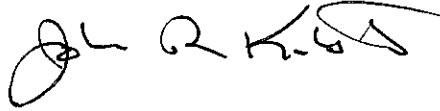
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Sincerely,

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John R. Kalish  
Field Manager

Electronic CC:

Greg Miller ([gmiller@blm.gov](mailto:gmillar@blm.gov))

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**MAY 20 2014**

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RETURN RECEIPT REQUESTED**

Ms. Lynn Valbuena  
Chairwoman  
San Manuel Band of Mission Indians  
26569 Community Center Drive  
Highland, CA 92346

Dear Chairwoman Valbuena:

The Bureau of Land Management (BLM) is reviewing an application for a right-of-way (ROW) grant and proposed Plan of Development (POD) submitted by Southern California Edison (SCE) to upgrade, operate, and maintain approximately 1.1 miles of two 220 kV transmission lines on BLM administered lands, and remove some existing lines. The project is part of SCE's proposed upgrades to Segment 6 of the larger six-segment West of Devers (WOD) Upgrade Project. Through WOD, SCE proposes to upgrade 45 miles of two 220kV transmission lines between Palm Springs and San Bernardino, California (see Enclosure 1). The proposed project includes:

- replacement of two existing single-circuit and one existing double-circuit 220 kV transmission lines and towers with two double-circuit 220 kV transmission lines and higher capacity equipment;
- relocation of two miles of 66 kV sub-transmission lines and four miles of 12 kV distribution lines;
- upgrades to six existing substations; and
- installation of telecommunications equipment.

The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. Most of the proposed Project is located within an existing SCE ROW corridor.

Under Federal law, the BLM is responsible for processing ROW applications for facilities proposed to be constructed and operated on public lands. In processing the applications, the BLM must comply with the requirements of the National Environmental Policy Act (NEPA), which requires that Federal agencies reviewing projects under their jurisdiction consider the environmental impacts associated with their construction and operation. An Environmental

Impact Statement/Environmental Impact Report (EIS/EIR) will be prepared to evaluate the impacts of the proposed WOD Project. The California Public Utilities Commission (CPUC) is the State lead agency for the preparation of the EIR in compliance with the requirements of the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et. seq.), CEQA implementing guidelines (California Code of Regulations [CCR] Title 14, Section 15000 et. seq.). The BLM is the Federal lead agency for the preparation of the EIS in compliance with the requirements of the NEPA, the Council on Environmental Quality (CEQ) regulation for implementing NEPA (40 Code of Federal Regulations [CFR] 1500 – 1508), and the BLM NEPA guidance handbook (H-1790-1).

A joint EIS/EIR will be prepared to evaluate the proposed Project. The BLM is also the Federal lead agency for compliance with Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR Part 800). The proposed Project will concurrently be analyzed for its potential to affect historic properties as required by Section 106 of the NHPA, and we will utilize the public review process described in the NEPA to partially meet our public involvement responsibilities under the NHPA. In addition, Section 106 documentation for this proposed Project will be published on our website at <http://www.blm.gov/ca/st/en/fo/cdd.html>.

Consistent with the principles stated in Executive Order 13175 (Consultation and Coordination with Indian Tribal Governments, November 6, 2000), and the Executive Memorandum of April 29, 1994, (Government to Government Relations with Native American Tribal Governments), we are contacting you at the earliest stages of project review and seeking your views and comments, particularly with regard to any issues that may affect resources that are important to your Tribe. This letter serves to provide initial notification of the proposed Project, explain the role of the BLM, and invite the San Manuel Band of Mission Indians to enter into government-to-government consultation. The BLM will update the Tribe on the proposed Project throughout the review process, unless the Tribe has no further interest in consulting on this proposed Project. We would request that the Tribe inform us if it has no interest in this proposed Project or entering into consultation. If you are aware of any other Tribes, individuals, or affiliated Native American organizations that should be contacted regarding this proposed Project, please let us know. A list of other Tribal Government officials receiving this letter is provided for your reference (Enclosure 2).

Specific to Section 106 of the NHPA, the implementing regulation at 36 CFR 800 requires the BLM to consult with Indian tribes that attach religious or cultural significance to historic properties that may be affected by an undertaking. We request your assistance in identifying any issues or concerns the Tribe may have about the proposed Project, including identifying places of religious and cultural significance that might be affected by the proposed Project. To facilitate government-to-government consultation on this proposed Project for the purposes of Section 106 and to meet the requirements of the regulations, the BLM also requests that the San Manuel Band of Mission Indians tribal government identify those tribal representatives who have been designated to consult with the BLM on this proposed Project.

#### **Project Status**

SCE has developed a Proponents Environmental Assessment as part of the CPUC CEQA review requirements. SCE has contracted with LSA, an environmental consultant, to identify and

evaluate all historic and archaeological resources within the APE in support of the Proponents Environmental Assessment. To date, LSA has conducted a literature review, records search, and BLM Class III archaeological and built environment survey of the direct effects APE. The information gathered during the development of the Proponents Environmental Assessment was incorporated into the POD that was submitted to the BLM. The BLM is currently reviewing the draft Class III report prepared by LSA.

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If you would like to designate a representative to consult with the BLM, know of any other Tribes that should be contacted regarding this proposed Project, or have any questions or concerns about the proposed Project please contact:

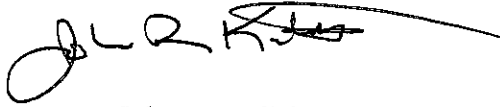
Brian Paul, Project Manager  
Renewable Energy Coordination Office  
Bureau of Land Management, California Desert District Office  
1661 S. 4<sup>th</sup> Street  
El Centro, CA 92243  
Phone: 760-337-4445  
Email: [rpaul@blm.gov](mailto:rpaul@blm.gov)

You can also contact Tiffany Thomas, Renewable Energy Coordination Office Archaeologist and Cultural Resources lead for the proposed Project, by telephone at (951) 697-5365, or email at [tathomas@blm.gov](mailto:tathomas@blm.gov).

We look forward to hearing from you regarding your interest in the West of Devers Upgrade Project and our invitation to initiate government-to-government consultation. If you have

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Sincerely,

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John R. Kalish  
Field Manager

Electronic CC:

Greg Miller ([gmiller@blm.gov](mailto:gmillier@blm.gov))

Brian Paul ([rpaul@blm.gov](mailto:rpaul@blm.gov))

Tiffany Thomas ([tathomas@blm.gov](mailto:tathomas@blm.gov))

George Kline ([gkline@blm.gov](mailto:gkline@blm.gov))

Mark Purdy ([mpurdy@blm.gov](mailto:mpurdy@blm.gov))

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**United States Department of the Interior  
BUREAU OF LAND MANAGEMENT**

Palm Springs-South Coast Field Office  
1201 Bird Center Drive  
Palm Springs, CA 92262-8001  
(760) 833-7100 Fax (760) 833-7199



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**In Reply Refer To:**  
CAD060/CAD000.06  
2831-03/2850(P)  
CACA-0063162

**MAY 20 2014**

**CERTIFIED MAIL 7012 3460 0000 2912 1635  
RETURN RECEIPT REQUESTED**

Ms. Rosemary Morillo  
Chairwoman  
Soboba Band of Luiseno Indians  
P.O. Box 487  
San Jacinto, CA 92581

Dear Chairwoman Morillo:

The Bureau of Land Management (BLM) is reviewing an application for a right-of-way (ROW) grant and proposed Plan of Development (POD) submitted by Southern California Edison (SCE) to upgrade, operate, and maintain approximately 1.1 miles of two 220 kV transmission lines on BLM administered lands, and remove some existing lines. The project is part of SCE's proposed upgrades to Segment 6 of the larger six-segment West of Devers (WOD) Upgrade Project. Through WOD, SCE proposes to upgrade 45 miles of two 220kV transmission lines between Palm Springs and San Bernardino, California (see Enclosure 1). The proposed project includes:

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- upgrades to six existing substations; and
- installation of telecommunications equipment.

The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. Most of the proposed Project is located within an existing SCE ROW corridor.

Under Federal law, the BLM is responsible for processing ROW applications for facilities proposed to be constructed and operated on public lands. In processing the applications, the BLM must comply with the requirements of the National Environmental Policy Act (NEPA), which requires that Federal agencies reviewing projects under their jurisdiction consider the environmental impacts associated with their construction and operation. An Environmental

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#### **Project Status**

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If you would like to designate a representative to consult with the BLM, know of any other Tribes that should be contacted regarding this proposed Project, or have any questions or concerns about the proposed Project please contact:

Brian Paul, Project Manager  
Renewable Energy Coordination Office  
Bureau of Land Management, California Desert District Office  
1661 S. 4<sup>th</sup> Street  
El Centro, CA 92243  
Phone: 760-337-4445  
Email: [rpaul@blm.gov](mailto:rpaul@blm.gov)

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We look forward to hearing from you regarding your interest in the West of Devers Upgrade Project and our invitation to initiate government-to-government consultation. If you have

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Sincerely,

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John R. Kalish  
Field Manager

Electronic CC:

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**United States Department of the Interior  
BUREAU OF LAND MANAGEMENT**

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**In Reply Refer To:**  
CAD060/CAD000.06  
2831-03/2850(P)  
CACA-0063162

**MAY 20 2014**

**CERTIFIED MAIL 7012 3460 0000 2912 1642  
RETURN RECEIPT REQUESTED**

Ms. Mary Resvaloso  
Chairwoman  
Torres-Martinez Desert Cahuilla Indians  
P.O. Box 1160  
Thermal, CA 92274

Dear Chairwoman Resvaloso:

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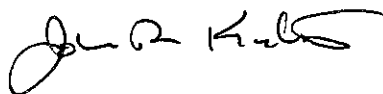
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Field Manager

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BUREAU OF LAND MANAGEMENT**

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**In Reply Refer To:**  
CAD060/CAD000.06  
2831-03/2850(P)  
CACA-0063162

**MAY 20 2014**

**CERTIFIED MAIL 7012 3460 0000 2912 1659  
RETURN RECEIPT REQUESTED**

Mr. Darrell Mike  
Chairman  
Twenty-nine Palms Band of Mission Indians  
46-200 Harrison Place  
Coachella, CA 92236

Dear Chairman Mike:

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SCE has developed a Proponents Environmental Assessment as part of the CPUC CEQA review requirements. SCE has contracted with LSA, an environmental consultant, to identify and



evaluate all historic and archaeological resources within the APE in support of the Proponents Environmental Assessment. To date, LSA has conducted a literature review, records search, and BLM Class III archaeological and built environment survey of the direct effects APE. The information gathered during the development of the Proponents Environmental Assessment was incorporated into the POD that was submitted to the BLM. The BLM is currently reviewing the draft Class III report prepared by LSA.

LSA is currently developing an evaluation plan for one archaeological site (CA-SBR-2311H/Guachama Rancheria) that requires additional archaeological testing in order to further evaluate. LSA is also developing a contingency evaluation plan for the evaluation of any additional resources that may be impacted based on a planned final project engineering design that is scheduled to be completed by June, 2014. This plan will further refine the current POD to account for information gathered during the Proponents Environmental Assessment studies and provide final locations for all proposed structures, equipment, and work areas. Once the final design has been released, the BLM and CPUC will reassess the cultural resources studies and determine if any additional evaluation needs must be addressed. Any additional evaluation that may become necessary, as a result of the final design completion, will be conducted according to the contingency developed in the evaluation plan.

The BLM has also requested that SCE conduct an ethnographic literature review and indirect effects analysis for the proposed Project. Since the proposed Project is an upgrade to existing transmission lines and is located almost entirely within an existing ROW corridor, the BLM has defined the indirect effects APE as one-half-mile beyond the direct effects APE. SCE's contractor will be analyzing indirect effects from the proposed Project to the location, setting, feeling, and association of known NRHP eligible or listed properties within the indirect effects APE. This study will include known historic, archaeological, and tribal resources.

If you would like to designate a representative to consult with the BLM, know of any other Tribes that should be contacted regarding this proposed Project, or have any questions or concerns about the proposed Project please contact:

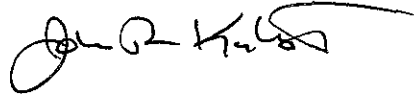
Brian Paul, Project Manager  
Renewable Energy Coordination Office  
Bureau of Land Management, California Desert District Office  
1661 S. 4<sup>th</sup> Street  
El Centro, CA 92243  
Phone: 760-337-4445  
Email: [rpaul@blm.gov](mailto:rpaul@blm.gov)

You can also contact Tiffany Thomas, Renewable Energy Coordination Office Archaeologist and Cultural Resources lead for the proposed Project, by telephone at (951) 697-5365, or email at [tathomas@blm.gov](mailto:tathomas@blm.gov).

We look forward to hearing from you regarding your interest in the West of Devers Upgrade Project and our invitation to initiate government-to-government consultation. If you have

additional questions or we can provide any clarification, please do not hesitate to contact us. I can be reached by telephone at (760) 326-7000 or by e-mail at [jkalish@blm.gov](mailto:jkalish@blm.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "John R. Kalish", with a long horizontal flourish extending to the right.

John R. Kalish  
Field Manager

Electronic CC:

Greg Miller ([gmiller@blm.gov](mailto:gmillier@blm.gov))

Brian Paul ([rpaul@blm.gov](mailto:rpaul@blm.gov))

Tiffany Thomas ([tathomas@blm.gov](mailto:tathomas@blm.gov))

George Kline ([gkline@blm.gov](mailto:gkline@blm.gov))

Mark Purdy ([mpurdy@blm.gov](mailto:mpurdy@blm.gov))

Enclosures:

1 - Project Area Map

2 - Tribal Contact List



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**In Reply Refer To:**  
CACA-063162  
2831-03 (P)  
CAD000.06/CAD060

**AUG 22 2014**

Chairman Jeff Grubbe  
Agua Caliente Band of Cahuilla Indians  
5401 Dinah Shore Drive  
Palm Springs, CA 92264

Dear Chairman Grubbe:

The Bureau of Land Management (BLM) is continuing consultation on Southern California Edison's (SCE) proposed West of Devers (WOD) Upgrade Project. The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. The BLM is the Federal lead agency for compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA); the California Public Utilities Commission (CPUC) is the lead state agency for compliance with the California Environmental Quality Act (CEQA). We have previously provided official notification regarding the proposed project and invited the Agua Caliente Band of Cahuilla Indians to consult in a government-to-government manner in a letter dated May 20, 2014. The purpose of this letter is to provide an update on our efforts to identify historic properties that may be affected by the undertaking and to notify you of archaeological site testing that will be conducted to support this effort. The BLM would also like to reiterate our invitation and request to engage in government-to-government consultation with your Tribe on this project.

***Identification and Evaluation Efforts Update***

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Based on the results of the Class III surveys, the BLM and CPUC have determined that additional information is required to evaluate seven archaeological resources for their eligibility for listing in the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR). Six archaeological sites (CA-RIV-11411, CA-RIV-11417, CA-RIV-11419, CA-RIV-11426, CA-SBR-11624H, and P-36-24295) require additional archival research in order to be evaluated under Criteria A/1 and B/2 for their association with significant events or persons in history. One archaeological site (CA-SBR-2311H) will require archaeological testing in order to be evaluated under Criterion D/4 for its information potential. A testing plan has been developed to guide the additional research efforts (enclosure 2). The archival research is currently underway and the fieldwork is currently being

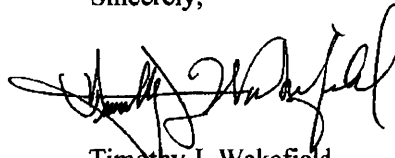
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Timothy J. Wakefield  
Acting Field Manager

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**In Reply Refer To:**  
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**AUG 22 2014**

Chairman Jeff Grubbe  
Agua Caliente Band of Cahuilla Indians  
5401 Dinah Shore Drive  
Palm Springs, CA 92264

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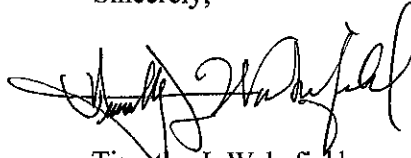
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If you would like to designate a representative to consult with the BLM, have any information regarding places of religious or cultural significance that may be affected by the proposed project, or have any questions or concerns about the proposed Project, please contact Frank McMenimen, Project Manager, by telephone at (760) 833-7150, or by email at [fmcmenimen@blm.gov](mailto:fmcmenimen@blm.gov), or Tiffany Thomas, Renewable Energy Archaeologist, by telephone at (951) 697-5365, or by email at [tathomas@blm.gov](mailto:tathomas@blm.gov).

We look forward to hearing from you regarding your interest in the West of Devers Upgrade Project and our invitation to continue government-to-government consultation. If you would like to schedule a government-to-government consultation meeting please do not hesitate to contact me. I can be reached by telephone at (760) 326-7000 or by e-mail at [twakefie@blm.gov](mailto:twakefie@blm.gov).

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Timothy J. Wakefield  
Acting Field Manager

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**In Reply Refer To:**  
CACA-063162  
2831-03 (P)  
CAD000.06/CAD060

**AUG 22 2014**

Chairwoman Mary Ann Green  
Augustine Band of Cahuilla Indians  
84-001 Avenue 54  
Coachella, CA 92236

Dear Chairwoman Green:

The Bureau of Land Management (BLM) is continuing consultation on Southern California Edison's (SCE) proposed West of Devers (WOD) Upgrade Project. The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. The BLM is the Federal lead agency for compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA); the California Public Utilities Commission (CPUC) is the lead state agency for compliance with the California Environmental Quality Act (CEQA). We have previously provided official notification regarding the proposed project and invited the Augustine Band of Cahuilla Indians to consult in a government-to-government manner in a letter dated May 20, 2014. The purpose of this letter is to provide an update on our efforts to identify historic properties that may be affected by the undertaking and to notify you of archaeological site testing that will be conducted to support this effort. The BLM would also like to reiterate our invitation and request to engage in government-to-government consultation with your Tribe on this project.

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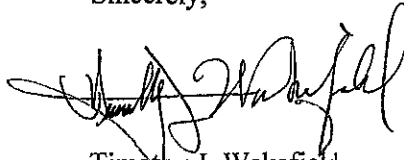
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Timothy J. Wakefield  
Acting Field Manager

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**In Reply Refer To:**  
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2831-03 (P)  
CAD000.06/CAD060

**AUG 22 2014**

Chairman Doug Welmas  
Cabazon Band of Mission Indians  
84-245 Indio Springs Parkway  
Indio, CA 92203-3449

Dear Chairman Welmas:

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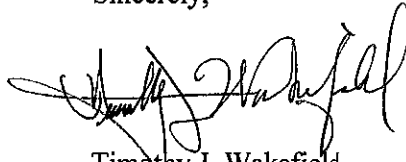
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Acting Field Manager

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**In Reply Refer To:**  
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2831-03 (P)  
CAD000.06/CAD060

**AUG 22 2014**

Chairman Luther Salgado, Sr.  
Cahuilla Band of Mission Indians  
52701 US Highway 371  
Anza, CA 92539-1760

Dear Chairman Salgado:

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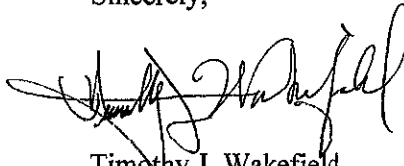
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If you would like to designate a representative to consult with the BLM, have any information regarding places of religious or cultural significance that may be affected by the proposed project, or have any questions or concerns about the proposed Project, please contact Frank McMenimen, Project Manager, by telephone at (760) 833-7150, or by email at [fmcmenimen@blm.gov](mailto:fmcmenimen@blm.gov), or Tiffany Thomas, Renewable Energy Archaeologist, by telephone at (951) 697-5365, or by email at [tathomas@blm.gov](mailto:tathomas@blm.gov).

We look forward to hearing from you regarding your interest in the West of Devers Upgrade Project and our invitation to continue government-to-government consultation. If you would like to schedule a government-to-government consultation meeting please do not hesitate to contact me. I can be reached by telephone at (760) 326-7000 or by e-mail at [twakefie@blm.gov](mailto:twakefie@blm.gov).

Sincerely,



Timothy J. Wakefield  
Acting Field Manager

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**In Reply Refer To:**  
CACA-063162  
2831-03 (P)  
CAD000.06/CAD060

**AUG 22 2014**

Chairman Edward Smith  
Chemehuevi Indian Tribe  
1990 Palo Verde Drive  
Havasu Lake, CA 92363

Dear Chairman Smith:

The Bureau of Land Management (BLM) is continuing consultation on Southern California Edison's (SCE) proposed West of Devers (WOD) Upgrade Project. The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. The BLM is the Federal lead agency for compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA); the California Public Utilities Commission (CPUC) is the lead state agency for compliance with the California Environmental Quality Act (CEQA). We have previously provided official notification regarding the proposed project and invited the Chemehuevi Indian Tribe to consult in a government-to-government manner in a letter dated May 20, 2014. The purpose of this letter is to provide an update on our efforts to identify historic properties that may be affected by the undertaking and to notify you of archaeological site testing that will be conducted to support this effort. The BLM would also like to reiterate our invitation and request to engage in government-to-government consultation with your Tribe on this project.

***Identification and Evaluation Efforts Update***

Since our last letter the Class III archaeological and built environment survey report has been completed. The final report, entitled *Cultural Resources Assessment and Class III Inventory, West of Devers Project, San Bernardino and Riverside Counties, California*, prepared by LSA, is include with this letter (enclosure 1). The final report includes the results of a literature review, records search, Class III archaeological survey and historic built environment survey within the Area of Potential Effects (APE) for the proposed project. Additional archival research on 33 historic buildings, structures, and features identified during the Class III survey is currently being conducted.

Based on the results of the Class III surveys, the BLM and CPUC have determined that additional information is required to evaluate seven archaeological resources for their eligibility for listing in the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR). Six archaeological sites (CA-RIV-11411, CA-RIV-11417, CA-RIV-11419, CA-RIV-11426, CA-SBR-11624H, and P-36-24295) require additional archival research in order to be evaluated under Criteria A/1 and B/2 for their association with significant events or persons in history. One archaeological site (CA-SBR-2311H) will require archaeological testing in order to be evaluated under Criterion D/4 for its information potential. A testing plan has been developed to guide the additional research efforts (enclosure 2). The archival research is currently underway and the fieldwork is currently being

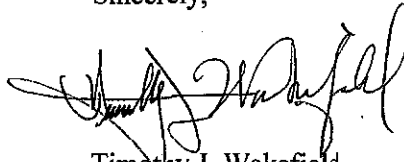
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We look forward to hearing from you regarding your interest in the West of Devers Upgrade Project and our invitation to continue government-to-government consultation. If you would like to schedule a government-to-government consultation meeting please do not hesitate to contact me. I can be reached by telephone at (760) 326-7000 or by e-mail at [twakefie@blm.gov](mailto:twakefie@blm.gov).

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**In Reply Refer To:**  
CACA-063162  
2831-03 (P)  
CAD000.06/CAD060

AUG 22 2014

Chairwoman Sherry Cordova  
Cocopah Indian Tribe  
14515 S. Veterans Dr.  
Somerton, AZ 85350

Dear Chairwoman Cordova:

The Bureau of Land Management (BLM) is continuing consultation on Southern California Edison's (SCE) proposed West of Devers (WOD) Upgrade Project. The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. The BLM is the Federal lead agency for compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA); the California Public Utilities Commission (CPUC) is the lead state agency for compliance with the California Environmental Quality Act (CEQA). We have previously provided official notification regarding the proposed project and invited the Cocopah Indian Tribe to consult in a government-to-government manner in a letter dated May 20, 2014. The purpose of this letter is to provide an update on our efforts to identify historic properties that may be affected by the undertaking and to notify you of archaeological site testing that will be conducted to support this effort. The BLM would also like to reiterate our invitation and request to engage in government-to-government consultation with your Tribe on this project.

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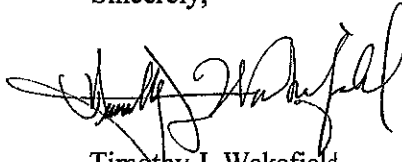
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**In Reply Refer To:**  
CACA-063162  
2831-03 (P)  
CAD000.06/CAD060

**AUG 22 2014**

Chairman Dennis Patch, Sr.  
Colorado River Indian Tribes  
26600 Mohave Road  
Parker, AZ 85344

Dear Chairman Patch:

The Bureau of Land Management (BLM) is continuing consultation on Southern California Edison's (SCE) proposed West of Devers (WOD) Upgrade Project. The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. The BLM is the Federal lead agency for compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA); the California Public Utilities Commission (CPUC) is the lead state agency for compliance with the California Environmental Quality Act (CEQA). We have previously provided official notification regarding the proposed project and invited the Colorado River Indian Tribes to consult in a government-to-government manner in a letter dated May 20, 2014. The purpose of this letter is to provide an update on our efforts to identify historic properties that may be affected by the undertaking and to notify you of archaeological site testing that will be conducted to support this effort. The BLM would also like to reiterate our invitation and request to engage in government-to-government consultation with your Tribe on this project.

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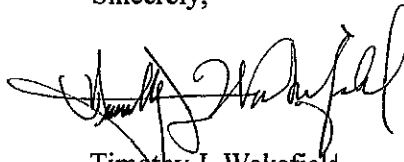
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Timothy J. Wakefield  
Acting Field Manager

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**In Reply Refer To:**  
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2831-03 (P)  
CAD000.06/CAD060

**AUG 22 2014**

Chairman Timothy Williams  
Fort Mojave Indian Tribe  
500 Merriman Avenue  
Needles, CA 92363

Dear Chairman Williams:

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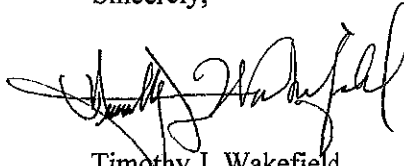
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**In Reply Refer To:**  
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AUG 22 2014

President Keeny Escalanti, Sr.  
Fort Yuma Quechan Tribe  
350 Picachu Road  
Yuma, AZ 85366-1899

Dear President Escalanti:

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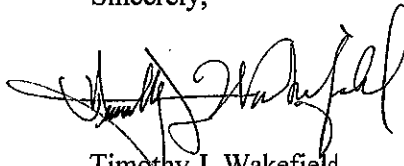
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**In Reply Refer To:**  
CACA-063162  
2831-03 (P)  
CAD000.06/CAD060

**AUG 22 2014**

Chairman Robert Martin  
Morongo Band of Mission Indians  
12700 Pumarra Rd.  
Banning, CA 92220

Dear Chairman Martin:

The Bureau of Land Management (BLM) is continuing consultation on Southern California Edison's (SCE) proposed West of Devers (WOD) Upgrade Project. The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. The BLM is the Federal lead agency for compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA); the California Public Utilities Commission (CPUC) is the lead state agency for compliance with the California Environmental Quality Act (CEQA). We have previously provided official notification regarding the proposed project and invited the Morongo Band of Mission Indians to consult in a government-to-government manner in a letter dated May 20, 2014. The purpose of this letter is to provide an update on our efforts to identify historic properties that may be affected by the undertaking and to notify you of archaeological site testing that will be conducted to support this effort. The BLM would also like to reiterate our invitation and request to engage in government-to-government consultation with your Tribe on this project.

***Identification and Evaluation Efforts Update***

Since our last letter the Class III archaeological and built environment survey report has been completed. The final report, entitled *Cultural Resources Assessment and Class III Inventory, West of Devers Project, San Bernardino and Riverside Counties, California*, prepared by LSA, is include with this letter (enclosure 1). The final report includes the results of a literature review, records search, Class III archaeological survey and historic built environment survey within the Area of Potential Effects (APE) for the proposed project. Additional archival research on 33 historic buildings, structures, and features identified during the Class III survey is currently being conducted.

Based on the results of the Class III surveys, the BLM and CPUC have determined that additional information is required to evaluate seven archaeological resources for their eligibility for listing in the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR). Six archaeological sites (CA-RIV-11411, CA-RIV-11417, CA-RIV-11419, CA-RIV-11426, CA-SBR-11624H, and P-36-24295) require additional archival research in order to be evaluated under Criteria A/1 and B/2 for their association with significant events or persons in history. One archaeological site (CA-SBR-2311H) will require archaeological testing in order to be evaluated under Criterion D/4 for its information potential. A testing plan has been developed to guide the additional research efforts (enclosure 2). The archival research is currently underway and the fieldwork is currently being

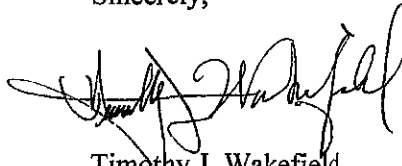
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If you would like to designate a representative to consult with the BLM, have any information regarding places of religious or cultural significance that may be affected by the proposed project, or have any questions or concerns about the proposed Project, please contact Frank McMenimen, Project Manager, by telephone at (760) 833-7150, or by email at [fmcmenimen@blm.gov](mailto:fmcmenimen@blm.gov), or Tiffany Thomas, Renewable Energy Archaeologist, by telephone at (951) 697-5365, or by email at [tathomas@blm.gov](mailto:tathomas@blm.gov).

We look forward to hearing from you regarding your interest in the West of Devers Upgrade Project and our invitation to continue government-to-government consultation. If you would like to schedule a government-to-government consultation meeting please do not hesitate to contact me. I can be reached by telephone at (760) 326-7000 or by e-mail at [twakefie@blm.gov](mailto:twakefie@blm.gov).

Sincerely,



Timothy J. Wakefield  
Acting Field Manager

Enclosures (2):

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**AUG 22 2014**

Chairman Joseph Hamilton  
Ramona Band of Mission Indians  
56310 Highway 371-Suite B  
Anza, CA 92539

Dear Chairman Hamilton:

The Bureau of Land Management (BLM) is continuing consultation on Southern California Edison's (SCE) proposed West of Devers (WOD) Upgrade Project. The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. The BLM is the Federal lead agency for compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA); the California Public Utilities Commission (CPUC) is the lead state agency for compliance with the California Environmental Quality Act (CEQA). We have previously provided official notification regarding the proposed project and invited the Ramona Band of Mission Indians to consult in a government-to-government manner in a letter dated May 20, 2014. The purpose of this letter is to provide an update on our efforts to identify historic properties that may be affected by the undertaking and to notify you of archaeological site testing that will be conducted to support this effort. The BLM would also like to reiterate our invitation and request to engage in government-to-government consultation with your Tribe on this project.

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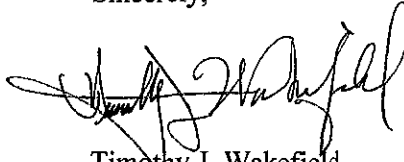
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We look forward to hearing from you regarding your interest in the West of Devers Upgrade Project and our invitation to continue government-to-government consultation. If you would like to schedule a government-to-government consultation meeting please do not hesitate to contact me. I can be reached by telephone at (760) 326-7000 or by e-mail at [twakefie@blm.gov](mailto:twakefie@blm.gov).

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Timothy J. Wakefield  
Acting Field Manager

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**AUG 22 2014**

Chairwoman Lynn Valbuena  
San Manuel Band of Mission Indians  
26569 Community Center Drive  
Highland, CA 92346

Dear Chairwoman Valbuena:

The Bureau of Land Management (BLM) is continuing consultation on Southern California Edison's (SCE) proposed West of Devers (WOD) Upgrade Project. The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. The BLM is the Federal lead agency for compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA); the California Public Utilities Commission (CPUC) is the lead state agency for compliance with the California Environmental Quality Act (CEQA). We have previously provided official notification regarding the proposed project and invited the San Manuel Band of Mission Indians to consult in a government-to-government manner in a letter dated May 20, 2014. The purpose of this letter is to provide an update on our efforts to identify historic properties that may be affected by the undertaking and to notify you of archaeological site testing that will be conducted to support this effort. The BLM would also like to reiterate our invitation and request to engage in government-to-government consultation with your Tribe on this project.

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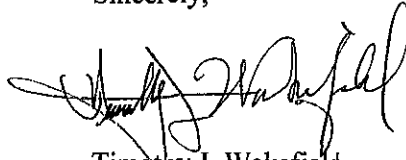
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We look forward to hearing from you regarding your interest in the West of Devers Upgrade Project and our invitation to continue government-to-government consultation. If you would like to schedule a government-to-government consultation meeting please do not hesitate to contact me. I can be reached by telephone at (760) 326-7000 or by e-mail at [twakefie@blm.gov](mailto:twakefie@blm.gov).

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Acting Field Manager

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**AUG 22 2014**

Chairwoman Rosemary Morillo  
Soboba Band of Luiseno Indians  
23904 Soboba Road  
San Jacinto, CA 92583

Dear Chairwoman Morillo:

The Bureau of Land Management (BLM) is continuing consultation on Southern California Edison's (SCE) proposed West of Devers (WOD) Upgrade Project. The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. The BLM is the Federal lead agency for compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA); the California Public Utilities Commission (CPUC) is the lead state agency for compliance with the California Environmental Quality Act (CEQA). We have previously provided official notification regarding the proposed project and invited the Soboba Band of Luiseno Indians to consult in a government-to-government manner in a letter dated May 20, 2014. The purpose of this letter is to provide an update on our efforts to identify historic properties that may be affected by the undertaking and to notify you of archaeological site testing that will be conducted to support this effort. The BLM would also like to reiterate our invitation and request to engage in government-to-government consultation with your Tribe on this project.

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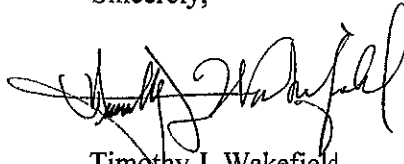
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Timothy J. Wakefield  
Acting Field Manager

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**AUG 28 2014**

Chairwoman Mary Resvaloso  
Torres-Martinez Desert Cahuilla Indians  
66725 Martinez Road  
Thermal, CA 92274

Dear Chairwoman Resvaloso:

The Bureau of Land Management (BLM) is continuing consultation on Southern California Edison's (SCE) proposed West of Devers (WOD) Upgrade Project. The proposed Project crosses lands managed by the BLM, lands in private ownership, as well as portions of the Morongo Band of Mission Indians Tribal Reservation. The BLM is the Federal lead agency for compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA); the California Public Utilities Commission (CPUC) is the lead state agency for compliance with the California Environmental Quality Act (CEQA). We have previously provided official notification regarding the proposed project and invited the Torres-Martinez Desert Cahuilla Indians to consult in a government-to-government manner in a letter dated May 20, 2014. The purpose of this letter is to provide an update on our efforts to identify historic properties that may be affected by the undertaking and to notify you of archaeological site testing that will be conducted to support this effort. The BLM would also like to reiterate our invitation and request to engage in government-to-government consultation with your Tribe on this project.

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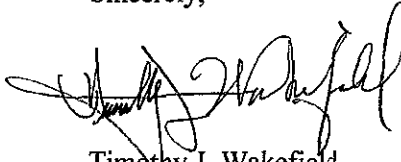
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**AUG 22 2014**

Chairman Darrell Mike  
Twenty-nine Palms Band of Mission Indians  
46-200 Harrison Place  
Coachella, CA 92236

Dear Chairman Mike:

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***Identification and Evaluation Efforts Update***

Since our last letter the Class III archaeological and built environment survey report has been completed. The final report, entitled *Cultural Resources Assessment and Class III Inventory, West of Devers Project, San Bernardino and Riverside Counties, California*, prepared by LSA, is include with this letter (enclosure 1). The final report includes the results of a literature review, records search, Class III archaeological survey and historic built environment survey within the Area of Potential Effects (APE) for the proposed project. Additional archival research on 33 historic buildings, structures, and features identified during the Class III survey is currently being conducted.

Based on the results of the Class III surveys, the BLM and CPUC have determined that additional information is required to evaluate seven archaeological resources for their eligibility for listing in the National Register of Historic Places (NRHP) and the California Register of Historic Resources (CRHR). Six archaeological sites (CA-RIV-11411, CA-RIV-11417, CA-RIV-11419, CA-RIV-11426, CA-SBR-11624H, and P-36-24295) require additional archival research in order to be evaluated under Criteria A/1 and B/2 for their association with significant events or persons in history. One archaeological site (CA-SBR-2311H) will require archaeological testing in order to be evaluated under Criterion D/4 for its information potential. A testing plan has been developed to guide the additional research efforts (enclosure 2). The archival research is currently underway and the fieldwork is currently being

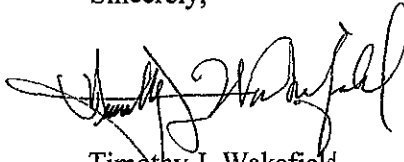
coordinated with the private land-owner. SCE will be contacting you soon regarding your interest in participating in the fieldwork.

The BLM is still gathering information regarding significant resources that may be affected by the proposed Project. We again request your assistance in identifying any issues or concerns the Tribe may have about the proposed Project, including identifying places of religious and cultural significance that might be affected by the proposed Project. To facilitate government-to-government consultation on this proposed Project for the purposes of Section 106 and to meet the requirements of the regulations, the BLM also requests that the Agua Caliente Band of Cahuilla Indians tribal government identify those tribal representatives who have been designated to consult with the BLM on this proposed Project.

If you would like to designate a representative to consult with the BLM, have any information regarding places of religious or cultural significance that may be affected by the proposed project, or have any questions or concerns about the proposed Project, please contact Frank McMenimen, Project Manager, by telephone at (760) 833-7150, or by email at [fmcmenimen@blm.gov](mailto:fmcmenimen@blm.gov), or Tiffany Thomas, Renewable Energy Archaeologist, by telephone at (951) 697-5365, or by email at [tathomas@blm.gov](mailto:tathomas@blm.gov).

We look forward to hearing from you regarding your interest in the West of Devers Upgrade Project and our invitation to continue government-to-government consultation. If you would like to schedule a government-to-government consultation meeting please do not hesitate to contact me. I can be reached by telephone at (760) 326-7000 or by e-mail at [twakefie@blm.gov](mailto:twakefie@blm.gov).

Sincerely,



Timothy J. Wakefield  
Acting Field Manager

Enclosures (2):

- 1 - *Cultural Resources Assessment and Class III Inventory, West of Devers Project, San Bernardino and Riverside Counties, California*
- 2 - *Cultural Resources Evaluation Report and Testing Plan for Southern California Edison Company's West of Devers Upgrade Project, Riverside and San Bernardino Counties, California*

Electronic CC:

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